# 

(4 Pages)

# AGRICUTURE H

CN-0909 (Rev. 11/95)

# **Hazardous Waste Notification**



Tennessee Department of Environment and Conservation; Division of Solid Waste Management Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

NEW

| P. O. Box 188  White Bluff Tn  3 a. Site address 4600 Highway 70 White Bluff Tn  b. Latitude (degrees, minutes & seconds)  Longitude (degrees, minutes & seconds)  4. Owner name (may be corporation or company name)  Tennessee Sewing Machine Attachment Co.,Inc.  5. Manager or operator name  Robert E. Galya, President  | TNROCOO   |
|---|---|
| 2. Mailing address P. O. Box 188 White Bluff Tn  3 a. Site address 4600 Highway 70 White Bluff Tn  4. Owner name (may be corporation or company name) Tennessee Sewing Machine Attachment Co., Inc.  5. Manager or operator name Robert E. Galya, President  6. Principal technical contact  City White Bluff Tn  Longitude (degrees, minutes & second)  Type  Type  Type  FAX number with area code        | Zip code  |
| P. O. Box 188  White Bluff Tn  3 a. Site address 4600 Highway 70  b. Latitude (degrees, minutes & seconds)  4. Owner name (may be corporation or company name)  Tennessee Sewing Machine Attachment Co., Inc.  5. Manager or operator name  Robert E. Galya, President  6. Principal technical contact  White Bluff Tn  Longitude (degrees, minutes & seconds)  Type  Type  Type  FAX number with area code | 37187-0188  Zip code   County name  37187-0188   Dickson  is)  Phone with area code  615-797-3144  Phone with area code  615-797-3144 |
| 4600 Highway 70  b. Latitude (degrees, minutes & seconds)  4. Owner name (may be corporation or company name)  Tennessee Sewing Machine Attachment Co., Inc.  5. Manager or operator name  Robert E. Galya, President  6. Principal technical contact  White Bluff  To  Longitude (degrees, minutes & seconds)  Type  Type  Type  FAX number with area code   | 37187-0188 Dickson is)  Phone with area code 615-797-3144  Phone with area code 615-797-3144  |
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| FAX number with area code   | Phone with area code<br>615–797–3144  |
| 6. Principal technical contact FAX number with area code  | <del></del>   |
| 6. Principal technical contact FAX number with area code  |   |
|   |   |
| . •   | 615~797–3144  |
| 7. Number of employees   Year operation began   SIC codes (Primary SIC first,etc.)  | Job shop  |
|   |   |
| 47 1977 3 <i>559</i>  | Yes No.   |
| 8. Emergency contacts for 24 hours per day and 7 days per week  Name  Time period covered   | Phone with area code  |
| The head (3A) /A Day 7  | 615-446-7311  |
| b. 1  |   |
| Thomas balyn 24   | 615-446.2848  |
| HEUNY GOOCH 24  | 615-441-1849  |
| d.  |   |
| 9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No 💢.  |   |
| 10. Certify that the information given in this document is true, accurate and complete by signing and dating.  Signature of authorized representative   Title   | Date  |
| President   | 2–26–98   |
| Below is for Department Use My ***  11. Date received   County code   Priority   Generator   Small Generat  | or   Special status   |
| S2/27/98 23 Yes No  | or   Special status   |
| 12. Date closed   TSDR status   Transporter status  |   |
| Tallopolitol otetus   |   |
| 13. Comments  | RECEIVED  |
|   |   |
|   |   |
|   | FEB 27 1998   |



Hazardous Waste Stream Report
Tennessee Department of Environment and Conservation, Division of Solid Waste Management Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

|  |                      |   |                    |                               | New                       |
|--|----------------------|---|--------------------|-------------------------------|---------------------------|
| 1. Organization's full name at facili                                    | 1 /3                 |   |                    | EPA identific                 | ation code                |
| 2. Waste name. Use standard nam  | wt Co. INC           |   | <del>,</del>       | I MASTE STO                   | EAM NUMBER                |
| Waste Potassium Gar  | ` <i>T</i>           | · · · · · · · · · · · · · · · · · · ·                     |                    | WASIESIK                      | AM NOMBER                 |
| 3. Give the years that this waste h                                      | as been              | Date no longer geñe                                       | ated.              | Annual Frequ                  | ency of generation        |
| generated, e.g. 1975, 1982   | ·                    | (MM/DD/YY)<br>2/14/48                                     |                    | Continuous                    | Accidental/ Various       |
| 4. Circle all appropriate hazard crite                                   | eria below.          | EPA waste codes. (Pr                                      | imary first;       | SIC code for                  | One time                  |
| Ignitable (a), EP toxic (b), Corros<br>Reactive (e) Other toxic (f), TCL | sive (c),            | six maximum.)   | ×63                | process.                      | 3559                      |
| 5. Physical form code 6  % Solid   | % Water              | Vol. to wt. conversio                                     | n   If used for fu | el,                           |                           |
| GRANGER Solva 7 100  | A                    | (pounds/gallon)   | chlorine cont      | ent(PPM)                      | BTU per pound             |
| 6. Generation rates in kilograms.  |                      |   |                    |                               |                           |
| Monthly maximum (kg)   | Annual ave           | rage (kg)<br>2 <i>Kg</i>                                  | Maximum sto        | ored onsite (kg)              | Maximum days stored       |
| 7. DOT shipping name   | 00                   | <u> </u>  | DOT hazard         | class                         | DOT ID code               |
|  | Λ .                  |   | ) J J J J          |                               |                           |
| Waste Votasium ( 8. Describe the generation process                      | yanide               |   | 6.1                | <u> </u>                      | UN1680                    |
| 9. Chemical Characteristics.   |                      |   |                    |                               | nits. Use PPM for TCLP    |
| PH WA  | Flash point<br>  W/A | ` Reactive coo  |                    | and EP Toxic was volume (), % | astes<br>weight(), PPM( ) |
| Hazardous constituents. Give r   | ange of values at ri | ght.  |                    | ower value                    | upper value               |
| A. Potassina Ci  | ANIde                |   |                    |                               | 100                       |
| В.   |                      |   |                    |                               |                           |
| C.   |                      |   |                    |                               |                           |
| D.   |                      |   |                    |                               |                           |
| · · · · · · · · · · · · · · · · · · ·                                    |                      |   |                    |                               |                           |
| E  |                      |   |                    |                               |                           |
| 10. Describe how you have manage   |                      |   |                    |                               | 1                         |
|  | ed or intend to man  | age this waste through                                    | final disposition. |                               |                           |
| A  | ethod Codes on pag   | age this waste <i>through</i><br>ge 6 of the instructions | final disposition. | RE                            | CEIVED                    |
| SOI/TO   | ethod Codes on pag   | age this waste <i>through</i><br>ge 6 of the instructions | final disposition. |                               | ECEIVED B 2 7 1998        |
| A  | ethod Codes on pag   | age this waste <i>through</i><br>ge 6 of the instructions | final disposition. |                               |                           |



# STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Solid Waste Management Fifth Floor, L & C Tower 401 Church Street Nashville, TN 37243-1535

# Waste Generator Notification Fee

Effective December 28, 1992, Rule 1200-1-11-.08(2) of the Tennessee Hazardous Waste Management Fee Regulations requires new generators to submit a one-time <u>application fee</u> of \$50.00 along with their first-time notification. The fee must be received by the Department before an EPA ID Number can be assigned and the notification reviewed.

Please enter information requested below and return this letter to the above address along with your application fee to insure proper processing. NOTICE: Make your check payable to *Treasurer, State of Tennessee*.

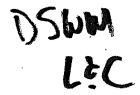
| NAME   |
|--|
| Tennessee Sewing Machine Attachment Company, Inc.          |
| Total Cooper Country Machine Medical Micros Company, 1110. |
| MAILING ADDRESS  |
| P. O. Box 188  |
| CITY, STATE AND ZIP CODE                                   |
| White Bluff, Tn 37187-0188                                 |
| SITE LOCATION  |
|  |
| CONTACT NAME PHONE NUMBER WITH AREA CODE                   |
| Kerry Gooch 615-797-3144                                   |
| AMOUNT ENCLOSED: \$  |
| 50.00  |
| For DEPARTMENT use only:                                   |
| LOG ID CODE   STAFF INITIALS   NEWLY ASSIGNED EPA ID CODE  |
| 208C DBW THR 00 000 599/                                   |
| CD NO.   DATE RECEIVED   AMOUNT   RECEIPT NO.   COMMENTS   |
| ASUB128 5000 AC6888 & DECEMEN                              |
| * RECEIVED   |

CN-1033 (Rev. 11/95)

FEB 2 7 1998

Div. of Solid & Hazardous Waste





# STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Solid Waste Management Fifth Floor, L & C Tower 401 Church Street Nashville, Tennessee 37243 - 1535

March 9, 1998

. Tennessee Sewing Machine Attachment Co., Inc.

ATTN: KERRY L. Gooch

P.O. Box 188

White Bluff, TN. 37187-0188

Re:

EPA ID Number

Site Location:

4600 Highway 70

White Bluff, TN. 37187-0188

Dear Mr. Gooch:

This letter will serve as official notice of your EPA ID Number TNR 00-000-5991 which should be used on all reports and correspondence submitted to the Department.

The EPA ID Number is assigned to this specific physical location. Should you ever relocate, you would be required to apply for a new EPA ID Number for that location.

PLEASE NOTE: If you generate greater than 100 kilograms (220 pounds) in any month, you must file an Annual Report with the Division of Solid Waste Management and pay a Generator Fee by the following March 1.

If you have further questions about this subject please contact Dennis Woodson at (615) 532-0487.

Sincerely,

, Bobby W. Morrison, Manager

miliara L

Waste Activity Audit

Division of Solid Waste Management

BWM/DW/jk/gooch

cc: Nashville Field Office

### REGULATORY REVIEW DOCUMENTS

TENNSCO COPORATION

(74 Pages)

#### SITE INSPECTED

Tennsco Corporation
Plant I - East Broad Street
P. O. Box 606
Dickson, Tennessee 37055
TND 004035853

#### PRIMARY CONTACT

Mickey Self

#### INSPECTION DATE AND TIME

February 15, 1985 Starting at 9:00 a.m.

#### INSPECTOR AND REPORTER

Bob Gardner 701 Broadway, B-30 Nashville, Tennessee 37219-5403 742-6649

#### PURPOSE OF INSPECTION

This routine unannounced full inspection was conducted to evaluate Tennsco's compliance with the applicable requirements of the <u>Rules Governing Hazardous Waste Management</u> in Tennessee.

#### **EVALUATION BASIS**

Generator of hazardous waste - Rule 1200-1-11-.03

#### FACILITY DESCRIPTION

One hazardous waste is generated at this location - Flammable Liquid D001 consisting of bad paint, and paint equipment flush solvent. All waste is accumulated in 55-gallon drums and pumped into the transport tanker. Waste paint sludge from a high solids paint line has been evaluated and found to be non-hazardous. This waste is also sent to a secure landfill for disposal only because it can not be suitably handled at the local sanitary landfill.

#### MANIFEST SUMMARY

| Date     | Quantity    | Date     | Quantity    |
|----------|-------------|----------|-------------|
| 1-07-83  | 2310 Gallon | 2-01-84  | 4000 Gallon |
| 2-16-83  | 1815        | 2-06-84  | 3520        |
| 3-29-83  | 1705        | 2-10-84  | 1650        |
| 5-27-83  | 1320        | 3-29-84  | 2860        |
| 6-30-83  | 1595        | 6-12-84  | 2145        |
| 9-20-83  | 4725        | 8-23-84  | 5000        |
| 10-21-83 | 2695        | 10-20-84 | 3650        |
| 2-04-85  | 4600        |          |             |

HAZARDOUS WASTE FACILITY INSPECTION Tennsco Corporation Page 2

|                              | <u>1983</u> | 1984   |
|------------------------------|-------------|--------|
| Total Quantity Shipped, Kg.  | 55,000      | 65,000 |
| Monthly Generation Rate, Kg. | 5,300       | 4,900  |

Specific Gravity = 0.9, Assumed 55 gallon per drum.

Transporter - Resource Recycling Tech. - TND 081455891 - Facility - Chem-Fuel - TND 000737510

#### COMMENTS

At the time of the last hazardous waste inspection on August 23, 1982, Tennsco had two plants located about two miles apart in Dickson with both generating a hazardous waste. Only the Broad Street plant had been assigned an identification number (TND 004035853). Wastes from both plants have been manifested under this I.D. number. Tennsco has been asked to submit a generator notification for the second plant located in the old Winner Boat facility.

#### INSPECTION FINDINGS

The following violations of Rule 1200-1-11-.03 were found at the time of inspection:

- 1. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule
  1200-1-11-.07 provided that the generator assures that the personnel training program, at a minimum be designed to ensure that employees are able to respond effectively to energencies by familiarizing them with emergency procedures, emergency
  equipment, and emergency systems including where applicable: (1) procedures for
  using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (2) key parameters for automatic waste feed cut-off systems (if any); (3)
  communications or alarm systems; (4) response to fires or explosions; (5) response
  to ground-water contamination incidents; and (6) shutdown of operations. (0107)
- 2. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program be reviewed annually by all employees who handle or manage hazardous waste. (0125)
- 3. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing the job title for each position related to hazardous waste management and the name of the employee filling each job. (0126)
- 4. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written job description for each position related to hazardous waste management. (0127)

HAZARDOUS WASTE FACILITY INSPECTION Tennsco Corporation Page 3

- 5. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written description of the type and amount of both introductory and continuing training that will be given to each employee who handles or manages hazardous waste. (0128)
- 6. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule
  1200-1-11-.07 provided that the generator maintains records that document that all
  the required personnel training or job experience has been given to and completed by
  the employees who handle or manage hazardous waste. (0135)
- 7. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator retains training records on current employees who handle or manage hazardous waste while hazardous waste is being accumulated. Training records of former employees must be kept for at least three years from the date the employee last worked at the position which handles or manages hazardous waste. Personnel training records may accompany an employee transferred within the
- 8. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule
  1200-1-11-.07 provided that the generator designs his contingency plan to minimize
  hazards to public health or the environment from fires, explosions, or any unplanned
  sudden or nonsudden release of hazardous waste or hazardous waste constituents to air,
- 9. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the actions employees must take to immediately respond to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the accumulation area(s). (0165)
- 10. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate a hazardous waste onsite for 90 days or less without a permit or without interim status under Rule
  1200-1-11-.07 provided that the generator's contingency plan describes how, whenever
  his designee when the emergency coordinator is on call) will immediately: activate
  internal alarms or communication systems, where applicable, to notify all other
  affected employees; and notify appropriate State or local agencies with designated
  response roles if their help is needed. (0166)

- 11. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is a release, fire, or explosion the emergency coordinator will immediately identify the character, exact source, amount, and areal extent of any released materials. He may do this by observation or review of facility records and if necessary, by chemical analysis. (0167)
- 12. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will concurrently assess possible hazards to public health or the environment that may result from a release, fire, or explosion. The assessment must consider both direct and indirect effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions. (0168)
- 13. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will immediately notify appropriate local authorities and the Tennessee Emergency Management Agency, if he determines that the facility has had a release, fire, or explosion which could threaten public health or the environment outside the facility, and then be available to help the appropriate officials decide whether local areas should be evacuated. (0169)
- 14. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, during an emergency, the emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable collecting and containing released waste, and removing or isolating containers. (0171)
- 15. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, immediately after an emergency, the emergency coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. (0173)
- 16. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule
  1200-1-11-.07 provided that the generator's contingency plan describes how the
  emergency coordinator will ensure that, in the affected accumulation area(s): no
  waste that may be incompatible with the released material is stored in the accumulation area until clean-up procedures are completed; and all emergency equipment
  listed in the contingency plan is cleaned and fit for its intended use before
  hazardous wastes are stored in the affected accumulation area(s). (0174)

- 17. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator will notify the Commissioner, and appropriate local authorities, that the cleanup procedures have been completed and all emergency equipment has been cleaned and fit for its intended use before hazardous waste are stored in the affected accumulation area(s). (0175)
- 18. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator's will note in his files the time, date, and details of any incident that requires implementing the contingency plan and how, within 15 days after the incident, he will submit a written report on the incident to Commissioner. (0176)
- 19. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule
  ments agreed to by local police departments, fire departments, hospitals, contractors,
  appropriate for the type of waste handled at the accumulation area and the potential
  need for the services of these organizations. (0177)
- 20. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate a hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan lists the names, emergency coordinator and keep this list up to date. Where more than one person listed, one must be named as primary emergency coordinator and others must be 11sted in the order in which they will assume responsibility as alternates. (0185)
- 21. Rule 1200-1-11-,03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule
  1200-1-11-,07 provided that the generator's contingency plan includes the location,
  a physical description and a brief outline of the capabilities of each item on the
  list of emergency equipment at the accumulation area (such as fire extinguishing
  systems, spill control equipment, communications and alarm systems (internal and
  external) and decontamination equipment), where this equipment is required. (0197)
- 22. Rule 1200-1-11-,03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule plan for employees where there is a possibility that evacuation could be necessary. In an alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires). (0205)

- 23. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains a copy of the contingency plan and all revisions to the plan and submits them to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. (0207)
- 24. Rule 1200-1-11-.03(5)(b)1 requires a generator to submit an annual report to the Department by March 1 for the preceding calendar year. (0432) Reports have not been received for 1982 or 1983.
- 25. Rule 1200-1-11-.03(5)(b)1 requires a generator who ships his hazardous waste offsite to submit an annual report on forms provided by the Department and the form completed according to the instructions accompanying it. (0435)
- 26. Rule 1200-1-11-.03(4) requires each generator who ships hazardous waste off-site for storage, treatment, or disposal to submit along with the annual report an annual maintenance fee of 100 dollars (\$100). (0437)
- 27. Rule 1200-1-11-,03(4)(b)1(i) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule
  1200-1-11-.07 provided that the generator, if the waste is stored in containers,
  ensures that containers holding hazardous waste are always kept closed during
  storage, except when it is necessary to add or remove waste. (0447)
- 28. Rule 1200-1-11-.03(4)(b)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. (0515)
- 29. Rule 1200-1-11-.03(4)(b)1(iii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that while hazardous waste is being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste". (0525)
- 30. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator accumulates the hazardous waste in a manner non-sudden release of hazardous waste or fire, explosion, or any unplanned sudden or or surface water which could threaten public health or the environment. (0535) Area management difficult.

- 31. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule
  1200-1-11-.07 provided that the generator ensures that the accumulation area(s) is
  equipped with a devise, such as a telephone (immediately available at the scene of
  from local police departments, fire departments, or State and local emergency response
  teams, unless none of the hazards posed by the waste accumulated warrent this kind
  area and is judged to be too remote for calling in assistance.
- 32. Rule 1200-1-11-,93(4)(b)1(iv) allows a generator to accumulate hazardous waste onsite for 90 days or less without a permit or without interim status under Rule
  1200-1-11-,07 provided that the generator maintains adequate aisle space to allow
  the unobstructed movement of employees, fire protection equipment, spill control
  equipment, and decontamination equipment in any emergency, unless aisle space is

SIGNED:

Bob Gardner

DATE:

2/28/85

FY 85-86 Remedial Action (SUPERFUND) Fee Worksheet

the Hazardous Waste Management program of the Department of Health and Environment. Ision of Fiscal Services, 6-620 Cordell Hull Building, Nashville, TN 37219.

EPA TO COOP IND OD-403-5853 Y=0
1TCKEY SELF
1ENNSCO COOP PLANT 1
20 BOX 606
2TCKSON TN 37055

Please complete and return to the above address. Please correct any incorrect information on the label. See the instruction pages and regulations for detailed linformation for completing this form. For technical lassistance, call (615) 741-6287.

| 4.6         | Enter the total amount of hazardou to Dec. 31, 1984, or, if no hazar enter the amount of hazardous wast  | dous wastes we                                      | re senerate              | d in the year of 1984.   | 110,054                | kЭ   |
|-------------|--|---|--------------------------|--|------------------------|------|
|             | Enter to the right the year the wa   | stes were gene                                      | rated as 19              | 84 or 1985.  | 1984                   | rear |
| 2 <b>a.</b> | Waste amount from fossil fuel combustion.  | ;   | is.<br>ks:               | Nunicipal incineration waste amount.   | ;                      | k9   |
| b.          | Gre_mining waste amount.   | 1   | ih.<br>kai               | Waste excluded by Petition amount,   | 1                      | kg   |
| C.          | Applicable energy associated waste amount.   | ;<br>;  | li.<br>kel               | Transportation spill waste amount.   | 1                      | kg   |
|             | Cement kiln dust waste amount.   | ;   | ij.<br>ke:               | Hazardous wastes no longer gen-<br>erated after April 30, 1985.                          |                        | kЭ   |
| e.          | Hastewater treatment plant influent waste amount. (See permit requirements.)   |   | ik.<br>i<br>kel          | Hazardous wastes produced from on-site treatment unless the original waste was excluded. | 1                      | kg   |
| ÷.          | Public Owned Treatment Works (POTW) sludge maste amount.   | :   | il.<br>ksi               | Inactive site clean-up waste amount.   |                        |      |
| D.          | Enter the sum of lines 2a - 21 to  | the right   | · · · ·                  |  | !                      | kΞ   |
|             | Enter the difference between line 1  | l and line 2(m)                                     | ),                       |  | 1 110,054              | kg:  |
| :<br>:      | If 1984 was entered in line 1, enter<br>entered in line 1, compute an estim<br>senerated by dividins line 3 by the<br>first four months of 1985 and multi<br>is used, check and attach documenta | eated annual to<br>number of mon<br>implying by 12. | tal amount<br>the waster | of hazardous wastes  | :                      | K9   |
|             | Enter the correct fee from Table 1 waste amount from line 4 above to d   | letermine the f                                     | 66.                      |  | 110,054<br>: <b>\$</b> |      |
| •           | If an acutery hazardous waste was g<br>and shipped off-site for disposal,<br>heck and attach documentation: {  | enter \$500.00.                                     | January I,<br>If this b  | 1984 through April 30, 1985<br>Waste was not landfilled,                                 | '\$<br>!               | . 1  |

PH-2397, (SWM nev. 3/35)

Form is continued on the back.

165 | 8-12-85 | 4,847.00 | 2876 |

JUL 03 1986

7-1 86 met OSUM L



Certified Mail
P 673 133 441
Return Receipt Requested

Sted JMA7-1

# TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT

CUSTOMS HOUSE 701 BROADWAY NASHVILLE, TENNESSEE 37219-5403

the

July 2, 1986

Mr. Mickey Self Tennsco Corportaion P.O. Box 606 Dickson, TN 37055 TND 004035853

RE: Hazardous waste generator facility inspection NOTICE OF VIOLATION

Dear Mr. Self:

On June 19, 1986, a routine, unannounced hazardous waste generator inspection was conducted at Tennsco in order to determine this facility's compliance with applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee. Violations noted during the inspection include the following:

Rule 1200-1-1+.03(4)(b)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. (0515)

Rule 1200-1-11.03 (4)(b)1(iii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11.07 provided that the generator ensures that while hazardous waste in being accumulated on-site, each container and tank is labeled or marked clearly wiht the words, "Hazardous Waste". (0525)

Rule 1200-1-11.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.7 provided that the generator ensures that the accumulation area(s) is equipped with portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas or dry chemical), spill control equipment, and decontamination equipment, unless none of the hazards posed by the waste accumulated warrent this kind of equipment. (0565)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator tests and Maintains all communications or alarm systems, fire protection equipment, where required, as necessary to assure it proper operation in time of emergnecy. (0585)

Rule 1200-1-11-.03(2)(d) requires generators to be responsible for maintaining an up-to-date notification file by notifying the Department in writing of significant changes in the information submitted within 30 days after such changes. (0027)

Rule 1200-1-11-.03(4)(b)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator inspects the area where ocntainers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. (0035)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program be reviewed annually by all employees who handle or manage hazardous waste. (0125)

Rule 1200-1-11-.03(4)(b)(iv) allows a genreator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing the job title for each position related to hazardous waste management and the name of the employee filling each job. (0126)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate ahzarodus waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written job description for each position related to hazardous waste management (0127)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written description of the type and amount of both introductory and continuing training that will be given to each employee who handles or manages hazardous waste. (0128)

Rule 1200-1-11-.03(4)(b)(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the gneerator maintains records that document that all the required personnel training or job experience has been given to and completed by the employees who handle or manage hazardous waste (0135)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator retains training records on current employees who handle or manage hazardous waste while hazardous waste is being accumulated. Training records of former employees must be kept for at least three years from the date the employee last worked at the position which handles or manages hazardous waste. Personnel training records may accompany an employee transferred within the same company. (0145)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, during an emergency, the emergency coordinator's contingency plan describes how, during an emergency, the emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, collecting and containing released waste, and removing or isolating containers. (0171)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, if the facility stops operations in response to a fire, explosion, or release, the emergency coordinator will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate. (0172)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, immediately after an emergency, the emergency coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. (0173)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will ensure that, in the affected accumulation area(s): no waste that may be incompatible with the released material is stored in the accumulation area until contingency plan is cleaned and is fit for its intended use before hazardous wastes are stored in the affected accumulation area(s). (0174)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator will notify the Commissioner, and appropriate local authorities, that the cleanup procedures have bee completed and all emergency equipment had been cleaned and fit for its intended use before hazardous waste are stored in the affected accumulatin area(s). (0175)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator's will note in his files the time, date, and details of any incident that requires implementing the contingency plan and how, within 15 days after the incident, he will submit a written report on the incident to Commissioner. (0176)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, as appropriate for the type of waste handled at the accumulation area and the potential need for the services of these organizations.

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes the location, a physical description and a breif outline of the capabilities of each item on the list of emergency equipment at the accumulation area furth as fire extinguishing systems, apill control equipment, communications and alarm systems (internal and external and derontamination equipment), where this equipment is required. (0197)

Pule 1200-1-11-.03(4)(b)!(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.78 provided that the generator's contingency plan includes an evacuation plan for employees where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires). (0205)

As you can see, most of the violations noted are of a documentation nature and should be relatively easy to correct. A follow-up inspection will be conducted on August 12, 1986 to determine if these violations have been corrected.

Enclosed with this letter is a blank Hazardous Waste Stream Description sheet. Your previously submitted Hazardous Waste Description (dated 3-27-85 and signed by you) indicated a monthly maximum generation rate of 728 Kg, which is highly inaccurate according to the amount of waste shipped off-site from this facility as shown on your 1985 (and including through 6-2-86) manifests. Please recalculate your generation rate, complete this form, and return it to me at the address shown on the form.

I would like to thank you for your cooperation shown during the inspection during what was an obviously hectic day for you. Should you have any questions, or if I can be of any assistance to you, please feel free to call me at 742-6649.

Sincerely,

Bob Vaughan

1301-Vaughe

DIVISION OF SOLID WASTE MANAGEMENT

BV/kdk

# DSWM LIC

Hazardous Wests Facility Description Temperate Descriped of Public Health, Division of Solid Wasts Management, Outtons House, 701 Broadway, Nashville, TN 37219-3403

| Organization's full made at facility.   | de de la company de la comp<br>La company de la company d   | PA identificati  | on code                      |
|---|---|--|------------------------------|
| ennaco Corp. Plant 1  | •<br>·  | TND-403-5  | 853                          |
| Mailing address   | City  | State abbrev.  | : IIP code                   |
| 2.0. Box 606  | Dickson   | TN   | 37055                        |
| Does your organization generate waste which is determined to be hezelfed the ardous by Rule 1200-1-1103(1)(b)?        | D. Does your facility dispose of hazardous sitting rules of 12  | iv treat, store, or<br>waste subject to wer-<br>00-1-11-,07(1)(6)? | Y+s (16)                     |
| Do you request a partial exemption because you waste as defined in rule 1200-1-1102(1)(e)?                            | are a small semerator of  | Mazardous  | Yes 🚱                        |
| Facility Physical location or address.  | المنظونات الأسادية المنطقة ال | 6. Facility con  | inty name                    |
| E Broad Street, Dickson , Tenn  | nessee 37055  | Dickson  | •                            |
| Cyner name  |   | Phone with area  | code                         |
| Lester D. Speyer  |   | 615-446-8  | 000                          |
| Manager or operator name  |   | : Phone with area  |                              |
| Jerry Estes   | ·<br>. ·  | 615-446-8  | 000                          |
| Principal technical contact   |   | ! Phone with area  |                              |
| Mickey B. Self or Stuart Spen   | ver   | 615-446-8  | • ′                          |
| Winder of employees   Year open. began<br>204   1963  | 2522  | lo firstietc.)   | Job shop<br>Yes No           |
| Emergency contacts for 24 hours per day and 7 of Name  Uerry Estes  | lars per week. I Time period covered any time   | . Phone with area<br>615-446-2                                     |                              |
| Kerry Dysinger  | anytime   | 615~446-3  | 380                          |
| Richard Manley  | anytime   | 615-446-6  | 562                          |
| Mickey Self   | anytime   | 615-789-5  | 618                          |
| Correct environmental Fermits for air water, so number and expiration date. In a range of relation date. See 1994301P | olid waste and radiologi<br>ated permits, summarize   | cal Permits. Vive Pe<br>by giving the first a                      | rmit typer<br>nd last permit |
| partity that the information siven in this on<br>Signature of owner or manager  | cument is true, accurate  | and complete by sign   | une and dating               |
| low is for 114. Data Received County Code   | Priority : Major Senr.  | Major TSSF   | ری هیست و شنیک د د د         |

| 0 40 35 853  e rase * ESA waste code ) DOO1  y as hazardous Rule 1200-1-11- Yes No                                    |
|---|
| DOO1  Y as harandous Rule 1200-1-11- Yes No and Yes No  |
| y as hazandous<br>Rute 1200-1-11- Yes No<br>and Yes No  |
| y as hazardous Ruse 1200-1-11- Yes No and Yes No  |
|   |
|   |
| Orașe, on disposel  |
| eria delos.   |
| م <u>ن ساحت ما مستورست و حصورت آن که که خواهد با استان به استان به استان با استان با استان با استان با استان با ا</u> |
| 3-7   |
|   |
| of Seneration<br>of Seasonal Various  |
| of Veneration<br>ns Seasonal Various<br>no Abdé   |
| s Seasonal Various  |
| s Sessons Various   |
| 301   |

Bad paint & paint thinner mixed for paint equipment clean-up & paint sludge from water wash booths.

| Lines 12/15 on back. Below is for department use only.  16. Complete? Test results?! Reasonable? Follow-us   Dor Haz. Class   Curr. Gen.   | · •            | Y            |
|--|----------------|--------------|
|  | RI             | tials<br>-G- |
| Status: Not hazardous (1): Denonstrated not hazardous (2): Seail generator (2): Resource recovery (4): Partial exemption (5): Hazardous (6): Accidental (7): No longer generated (8) | Status<br>Code | Received     |
| 17. Fublic Realth Comments.  | 6              | 8-13-85      |

**:** 

## Hazardous Waste Notification

Tennossee Department of Health and Environment, Division of Solid Waste Management. JAN / Customs House - Fourth Floor, 701 Broadway, Nashville, Tennessee 37219-5403

| . Organization's full name   | at facility.  |                                | EPA identificat        | ion code  |
|--|---|--------------------------------|------------------------|---|
| TENNSCO.   | CORPORATION   | 1 (PLANT                       | 1) TND 004             | 035853  |
| 2. Mailing address   |   | City                           | State abbrev.          | ZIP code  |
| P.O. BOX   | 606   | DICKSON                        | TN                     | 37055   |
| . Pacility physical locat:   |   |                                | Pacility county        |   |
| EAST BROAD   | 57  |                                | DICKSO                 |   |
| . Owner name   |   |                                | Phone with area        |   |
| LESTER D   | . SPEYER  |                                | (615) 446              | 8000  |
| . Manager or operator nam  |   | _                              | Phone with area        |   |
| JEARY ES   | TES   |                                | (615) 44               | 68000   |
| . Principal technical con  | tact  |                                | Phone with area        | <del></del>   |
| MICKEY SE  | LF  |                                | (615) 446              | 8000  |
| . Number of employees  | Date operation began  | SIC codes (Prisary             |                        | Job shop  |
| 151  | 1963  | 2522                           |                        | Yes (No)  |
| . Emergency contacts for a   | 24 hours per day and 7 d  |                                |                        |   |
| " JERRY ES   | ~~~   | Time period covered            | Phone with area        |   |
| b. 02/27 23  | 167   | ALL TIMES                      | (615) 41               | 162511  |
| KERRY D  |   | ,,                             | 10 -> 00               |   |
| c.   | Y S IN GETE   |                                | (615) 44               | 63380   |
| BICHARD !  | MANLEY  | 11 44                          | (615) 44               | 16 6562   |
| d.<br>MICKEY   | SELF  | "                              | (615) 78               | 19 56 18  |
| . Current environmental purpose and expiration de  | ermits for air water, so  | olid waste and radiolog        | * *                    |   |
| number and expiration d  | .w. m a large of lets   | tou permits, sammarize         | by giving the first a  | nd last permit.                                       |
|  | - '/  |                                | •                      |   |
|  | P € 9943  | A I P                          |                        |   |
|  |   |                                | •                      |   |
| 0. Certify that the information of authorized  | astice given in this doc  |                                | e and complete by sign | ing and dating  |
| O. Certify that the information of sutherized of sutherized of sutherized of the such of t | astice given in this doc  | ament is true, accurate        |                        | ing and deting Date                                   |
| O. Certify that the information of authorized control of the certific that the information of the certific that is for the certific that is for the certific that is for the certific that is the certific that it | nation given in this doc<br>d representative    County/code   F | ament is true, accurate        | NG AGENT               | nate<br>7/11/86                                       |
| O. Certify that the information of signature of suthorized control of the control | action given in this doc<br>i representative    County/code   F | Priority   Generator           | NG AGENT               | nate<br>7/11/86                                       |
| O. Certify that the information of signature of suthorized control of the control of the certification of the cert | action given in this doc<br>i representative    County/code   F | rument is true, accurate Title | NG AGENT               | nate<br>7/11/86                                       |
| O. Certify that the information of signature of suthorized control of the control of the certification of the cert | action given in this doc<br>i representative    County/code   F | Priority   Generator           | NG AGENT               | nate<br>7/11/86                                       |
| O. Certify that the information Signature of authorized Comparison of the control | action given in this doc<br>i representative    County/code   F | Priority   Generator           | NG AGENT               | ing and deting.<br>Date<br>7/11/84<br>Major generator |

| Tennessee Department of Hea<br>Customs House - Fourth Floo                      | lth and Environment, I<br>r, 701 Broadway, Nash                           | division of Soliville, TN 37219    | ld Waste Man<br>-5403                 | agement.                              |
|---|---|------------------------------------|---------------------------------------|---------------------------------------|
| 1. Organization's full name at fac  | ility.  |                                    | EPA identificat                       | tion code                             |
| TENNSOD CORP.   | (PLANT 1)   | -                                  | TND DOU                               | 035853                                |
| 2. Waste name. Use standard name  |   |                                    | Waste Stream II                       |                                       |
| FLUSH SOLVE   |   |                                    | . 1                                   | F005                                  |
| 3. Give the years that this maste   |   | 775. 1982-1984. Jun                | e 1985-                               |                                       |
| - SINCE 1963  | .' .  |                                    |                                       |                                       |
| 4. Hazard criteria. See rule 1200   |   | le the appropriate                 | criteria belo                         | y.                                    |
|   | (b), Corrosive (c), React:  |                                    |                                       |                                       |
| 5. Physical form  |   | ercent solid                       |                                       |                                       |
| LIQUID  |   | APIREXI                            | MATRI 6                               | 10% 3-10                              |
| 6. Generation rate in kilograms (1  | (G). Supply both rates.   1   |                                    |                                       |                                       |
| MODULY MEKINER ATTRIALS   | 0, 700  | 8.1                                | •                                     |                                       |
| 7. Maximum amount stored in kilogo  |   |                                    | f generation                          |                                       |
| 4800  | 90/   | Continuous                         | Accidenta? Va                         | arious                                |
| 8. DOT shipping name  |   | DOT hezard                         | class                                 | DOT ID. code                          |
|   |   |                                    |                                       |                                       |
| 9. Describe generation process.   |   |                                    |                                       | · · · · · · · · · · · · · · · · · · · |
| A SOLVENT MIX   | TURE OF 75%   | TOLUENE / 25                       | אלאושת יאי                            | 15080776                              |
| KETONE IS USED TO FAM   | IN AND CLEAN PAIN   | NT EQUIPANT                        | . A DOIT                              | -10 WALLY                             |
| SCRAP PAINT- OFF-SP   |   |                                    |                                       |                                       |
|   |   |                                    |                                       | •                                     |
|   |   |                                    |                                       |                                       |
|   |   |                                    |                                       |                                       |
|   | •   |                                    |                                       |                                       |
| Lines 10/14 on back. Below is for   | department upp only   |                                    | · · · · · · · · · · · · · · · · · · · |                                       |
| 15. Complete?   Test results? Re  | asonable? Follow-up   Dot   | laz. Class Ini                     | tials                                 |                                       |
| Yes No Yes No Y   | es No Yes No  | 57   1                             | 1AH                                   |                                       |
| Status: Not hazardous (1); De<br>Resource recovery (4)<br>Accidental (7); No lo | monstrated not hazardous (2; Partial exemption (5); Harager generated (8) | ); Small generator<br>zardous (6); | (3); Status<br>Code                   | Date<br>Received                      |
| 16. Comments.   |   |                                    |                                       | 1.1/10,01                             |
| arr consists to   |   |                                    |                                       | ÷                                     |
|   |   | •                                  |                                       |                                       |
| . /   |   |                                    |                                       |                                       |

PH-2022 (SMM 12/85 Rev.)

#### Hazardous Waste Notification Summary

JAN 09, 1987

e full instructions for form PH-2019 for additional information and codes. Organization's name EPA ID CODE TENNSCO CORPORATION (PLANT 1) TND 00-403-5853 Mailing address : City : State : ZIP code P.O. BOX 606 DICKSON TN 37055 Physical location or address : County name EAST BROAD ST DICKSON Owner name : Phone LESTER D SPEYER (615) 446-8000 5. MANAGER OR operator name : Phone JERRY ESTES (615) 446-8000 Principal technical contact : Phone MICKEY SELF (615) 446-8000 Number of employees : Year began :SIC codes : Job shop 151 1963 2522, NO 8. Emergency contacts for 24hours per day and 7 days per week Name : Time period covered A JERRY ESTES HOME (615)446-2511 B KERRY DYSINGER HOME (615)446-3380 C RICHARD MANLEY HOME (615)446-6562 D MICKEY SELF HOME (615)789-5618 9. Current environmental permits for air, water, and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit number. NONE 994298P AND 994301P 994298P L 994301P 994298P & 994301P 994298P & 994301P 10. I certify that this information is true, accurate and complete. Signature of authorized representative, title, date selow is for Department use only. Date roud: County: Priority: Generator: Small Gen.: Special status

Yes No : Yes

Date regulated : Date deregulated

13. Comments

012887

12. Date closed

Hazardous Waste Stream Report - Page 1 of 2

Full instructions for form PH-2022 for additional information and codes.

Organization's name. TENNSCO CORPORATION (PLANT 1)

: EPA TO CODE TND 00-403-5853

Naste name. FLUSH SOLVENT : Waste stream ID

Give years this waste has been generated.

: Frequency of generation CONTINUOUS

Mark all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f) CODES: AF

: EPA waste codes. F005

Physical form LIQUID. OTHER BASED

10 % 00-0

Percent solid : Volume to wt. (1b/gal)

b. Weneration rates in kilograms. 2400 1,600 20,700 101300

Monthly maximum : Annual average : Max. amount stored : Max. days stored 4.800

DOT shipping name WASTE PLAMMABLE LIQUID

: Dor hazard class : DOT ID code FLAMMABLE LIQUID 1993

Describe generation process. BAD PAINT & PAINT THINNER MIXED FOR PAINT EQUIPMENT CLEAR- UP. A SOLVERS MIXTURE OF 75% TOLUENE/25% METHYL ISOBUTYL KETONE IS USED TO PLUSH AND CLEAN PAINTING EQUIPMENT. THE WASTE MAY BE APPROXIMATELY 80% SOLVENT MINTURE AND 20% PAINT.

INNUAL REPORT SECTION \*\*\* Lines 9-11.

If the waste was shipped off-site, also submit Annual Shipping Report for Tagardous Waste Generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" codes from instructions.

Report Amount generated : Amount on-site (Amount on-site on: Wat mgmt methods/ 1662 during year (kg) tirst day
106: 8965 ~ 300. :last dav :TSDF handling codes

~ 300. Kg ; ~ 300 Ka Spi, T50,

Describe the efforts undertaken to reduce the volume and toxicity in the deneration of this waste during the reported year. This reduction refers to seneration processes and not treatment methods. SEGRIMATING THIS WASTE AND HON - HAZMOINS PAINT SLUDGE.

Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

Hemardous Haste Stream Report - Page 1 of 2 JAN 28 09. 1987 Mea full instructions for form PH-2022 for additional information and codes.

is Organization's name. TENNSCO CORPORATION (PLANT 283)

: EPA ID CODE : TND 98-089-5390

Maste name. PLUSH SOLVENT

Waste stream ID

Give years this waste has been generated.

: Frequency of generation CONTINUOUS

Mark all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c). Resotive (2), Other toxic (1) CODES ÀF

: EPA waste codes. F005

5. Physical form LIQUID, OTHER BASED

Percept solid : Volume to wt. (lbenel) 8.15

Teneration rates in kilograms.

Monthly maximum : Annual average : Max. amount stored : Max. days stored | 17000 17,400 99

box whipping name DESTE PLANMABLE LIQUID

: Dor hazard class : Dor ID code FLAMMABLE LIQUID

. Describe generation process. A SOLVENT MINIUME OF 75% TOLUENE /25% HETHYL ISOBUTYL KETONE IS USED TO FADER AND CLEAN PAINTING EQUIPMENT, THE WASTE MAY BE APPROXIMATELY BOX SOLVENT HIXTURE AND ZOX PAINT

ANNUAL REPORT SECTION \*\*\* If the waste was shipped off-site, also submit Annual Shipping Report for ceardous Maste Cenerators. If waste was handled on-site in a permitted recility, use "I", "5", or "D" codes from instructions. Otherwise, use "H" coles itom instructions.

August Amount generated : Amount on-site (Amount on-site on Wet ment methods) TSDF handling codes

1966: 26,200 ~200 % ~200 Ky S/754 DSO
10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to peneration processes and not treatment methods.

Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to pravious years since 1984

JAN 28 19889, 1987

Hazardous Waste Stream Report - Page 2 of 2

ull instructions for form PH-2022 for additional information and codes.

Organization's name. TENNSCO CORPORATION (PLANT 283)

: EPA ID CODE TND 98-084-5390

Waste name. FLUSH SOLVERT

\* Waste stream ID

12. Chemical Characteristics.
pH : Flash point pH : Flash point

Concentration units. For EP toxic wastes, indicate PPM.

Major and hazardous consituents. A TOLUENE

: lower : upper 60 75 20 25

B NETHYL ISOBUTYL KETONE

3. Describe handling methods with codes from instructions. Treatment codes :Storage codes 501

': Disposal codes

:Location OFF-SITE

Identify EPA ID code all transporter and TSDF operators involved in mending this waste.

15. I certify that this information is true, accurate and complete. SIGNATURE: (Generator or authorized representative), title and date.

Mande Manager

W is for department use only.

Date zevd Complete? Test results? Reasonable? Follow-up

status: Not hazardous (1); Demonstrated not hazardous (2);

Small generator (3); Resource recovery (4); Partial exemption (5); Mazardous (6); Accidental (7); No longer generated (8); Taxiance granted (9); Conditionally exempt (A).

Bonnents.

THE UNLY WASTE STAVOM NIW GENERATED IS FLUSH SOLVENT HIXED WITH SCRAP DAINT, - SHITEM

Hazardous Waste Stream Report - Page 1 of 2 JAN 09, 1987

See full instructions for form PH-2022 for additional information and codes.

NON-HAZAHDOUS

: EPA ID CODE THD 98-084-5390

Waste name. PAINT SLUDGE

1980

Organization's name.

: Waste stream ID

Give years this waste has been generated.

TENHSCO CORPORATION (PLANT 263)

: Frequency of generation CONTINUOUS

Mark all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e) Other toxic (f)
CODES:

EPA waste codes. N000

5. Physical form LIQUID. OTHER BASED : Percent solid : Volume to wt. (lb/gal) 100.0

Monthly maximum : Annual average : Max. amount stored : Max. days stored 6. Generation rates in kilograms. 9,750 813

7. DOT shipping name PAINT SLUDGE

: DOT hazard class : DOT ID code CINCEL SACRIFICATION 9189

Describe generation process. PAINT SLUDGE FROM WATER WASH TOUCH-UP PAINT BOOTHS, \*THIS WASTE IS NOT A HAZARDOUS WASTE. IT PASSES BOTH THE IGNITIBILITY TEST AND EP TOXICITY TEST. THE DSWM HAS ISSUED A "SPECIAL WASTE DISPOSAL" APPROVAL LETTER FOR PLACING IN A LOCAL SANITARY LANDFILL.

### ANNUAL REPORT SECTION \*\*\* Lines 9-11. . If the waste was shipped off-site, also submit Annual Shipping Report for Recardous Waste Generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" Report: Amount generated : Amount on-site : Amount on-site on: Wst mgmt methods/ :TSDF handling codes. Year : during year (kg) : first day : last day

10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984. Hazardous Waste Stream Report - Page 2 of 2

JAN 09, 1987

tes full instructions for form PH-2022 for additional information and codes

Organization's name. TENNSCO CORPORATION (PLANT 263)

EPA ID CODE TND 98-084-5390

Haste nome. PAINT SLUDGE

\* Waste stream ID

12. Chemical Characteristics. : Flash point 176 Hajor and hazardous consituents.

: Concentration units. For EP tonio : wastes, indicate PPM.

: lower : upper

13. Describe handling methods with codes from instructions. Storage codes Disperal codes

Location OFF-SITE

14. Identify EPA ID code all transporter and TSDF operators involved in handling this waste. ALD000622464

15. I certify that this information is true, accurate and complete. SIGHATURE: (Generator or authorized representative), title and date.

elou is for department use only.

16. Date rovd Complete? Test results? Reasonable? Pollow-up Initials Oliga ' Yes as tas To CLED No

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (5); Accidental (7); No longez generated (8); Mariance granted (9); Conditionally exempt (A).

17. Comments.

Hazardous Waste Stream Report - Page 1 of 2 See full instructions for form PH-2022 for additional information and codes. Organization's name. EPA ID CODE TENNSCO CORPORATION (PLANT 1) TND 00-403-5853 Waste name. : Waste stream ID WASTE PAINT Give years this waste has been generated. 3. : Frequency of generation CONTINUOUS Mark all appropriate hazard criteria below. EPA waste codes. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f) CODES: \*\* # 5. Physical form : Percent solid : Volume to wt. (lb/gal) LIQUID, OTHER BASED 5. Generation rates in kilograms. Monthly maximum : Annual average : Max. amount stored : Max. days stored 18,000 ec,400 77900 DOT shipping name : DOT hazard class : DOT ID code <del>NACED PERMITTEE DEQUE</del>D PLANNADLE LIQUID Describe generation process. PATNY SLUDGE FROM WATER WASH TOUCH-UP BOOTH THIS WASTE IS ABOUT 50% DAD PAINTY SCRAP PAINT AND SON WASTE PAINT WHICH IS COLLECTED PROTETIES PAINT ROOTH HALLS. Lines 9-11. ANNUAL REPORT SECTION \*\*\* If the waste was shipped off-site, also submit Annual Shipping Report for Razardous Waste Generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" codes from instructions. Report:Amount generated :Amount on-site :Amount on-site on:Wst mgmt methods/ Year : during year (kg) :first day :last day :TSDF handling codes ~ 300 K4 : ~ 300 Kg - 300ر 16 10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

SEE NOTE (1) Please key from #17 on next

Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT

OFFICE CORRESPONDENCE

This do -40 3 685

FROM TO DATE

Support Control of the control of the

At about 9:30 a.m. on September 11, 1987 I visited Tennsco to see their solvent recovery operation. Mr. Ed Owens was my contact. This visit was at Plant I at 402 E. Broad. Tennsco manufacturers metal shelving and other metal office furnishing. When cleaning the paint equipment used to paint these products spent solvent is generated. The solvent is recovered by on-site distillation. Mr. Owens says they recover about two gallons of solvent from a drum of waste. The reason he gave for the low amount of solvent recovered relative to the amount of waste was the type paint they use and the large amount of solids in the spent solvent. The still and its operation is consistent with the variance information. They have requested a "Special Waste" classification for the still bottoms. The distillation unit for Plant II has not yet been installed. Mr. Owens said he would let me know when the Plant II distillation unit is operating.

TY/lag L/M #8

SUBJECT: Tennsco Corp, Dickson Co., Variance for Plant I and II

| FROM        | DATE |
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#### **PUBLIC NOTICE**

The Commissioner of the Tennessee Department of Health and Environment is hereby giving notice of this tentative decision to grant a variance from classification as a waste, for spent flush solvent, Hazardous Waste Code D001, as generated at Tennsco Plant I, TND 004035853, 402 E. Broad in Dickson, Tennessee 37055, because this hazardous material is recycled in a manner which will not pose a significant hazard to public health or the environment. This variance will only apply to the material identified in the request and only when it is managed as described in the request.

Tennsco Corporation at their Plant I generates spent solvent in their painting process. The spent solvent is recovered on-site by a distillation process and reused as it was originally used. The on-site recovery and reuse of this hazardous waste will reduce the risk to health and environment associated with hazardous waste transportation and disposal.

The procedures for determining that certain hazardous materials that are being recycled will no longer be classified as wastes are provided in Tennessee Rule 1200-1-11-.01(4) Variance from Classification as a Waste.

Comments and/or requests for a hearing on this tentative decision will be accepted for 30 days ending at 4:30 p.m. <u>NCT 0 9 1987</u>

Comments or requests for a hearing should be sent to: Mr. Tom Tiesler, Director, Division of Solid Waste Management, Tennessee Department of Health and Environment, Customs House, 4th Floor, 701 Broadway, Nashville, Tennessee 37219-5403; phone (615) 741-3424.

The Commissioner will issue a final decision to either grant or deny the variance after receipt of comments and after the hearing (if any).

If you wish to review the draft variance, or wish further information, please contacts: Division of Solid Waste Management Field Office, Tennessee Department of Health and Environment, Customs House, Room B-01, Nashville, TN 37219-5403; phone (615) 741-5654.

TY/ah/SW-154



# STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Solid Waste Management Fifth Floor, L & C Tower 401 Church Street Nashville, TN 37243-1535

May 80, 1995

TND 00-403-5853

Tennsee Corporation (Plant 1)
Attn: Mickey Self
PO Box 606
Dickson, TN 87055

Dear Mr. Self:

This letter is to inform you that your "variance from classification as a waste" has expired for the enclosed waste stream(s). If you are still generating this waste, you will need to update the information on the attached Hazardous Waste Stream Reports o that our dambase remains current. The returned form, with any revisions, will serve as your official nonfication to the State on that waste, and as such, will require you to report on the waste stream in your Annual Report for 1995, which you will receive in January of 1996.

If we have not received the revised waste stream(s) by June 30, 1995, you will be considered a non-notifier and an inspection will be made by our field office. This could result in a Nouce of Violation being written for possible enforcement action.

If you no longer generate this waste, please complete line 3 on the Hazardons Waste Stream Report under the heading date no longer generated. Be certain the date is six digits (12-31-94, 09-13-94, etc.). Sign and date the back of the form (line 16) and send the corrected copy to my attention. The waste stream will then be closed out in our database diereby requiring no more paperwork from you in subsequent years (unless you reopen the waste stream).

If you have any question, you may contact me at (615) 532-0887.

Sincerella

Dennis Woodson Environmental Specialist Waste Activity Audit

DEW

Enclosure(s)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535
Please complete and/or correct, certify and return regardless. Retain a copy for your records. Organization's full name at facility EPA identification code TENNSCO CORPORATION (PLANT 1) TNO 00-403-5853 Waste name. Use standard name from regulations whenever possible. Waste Stream number PLUSH SOLVENT Give the years that this waste has been Date no longer generated. frequency of generation generated, e.g. 1975, 1982-. (MM/DD/YYY 1963 Continuous Accidental/ Various One time Circle all appropriate hazard criteria below. SIC code for generating -thrimary first; ignitable (a), EP toxic (b), Corrosive (c), Six maximum. 1 Reactive (e), Other toxic (f), TCLP (g). DEOCRES. 0001 Physical form. % Solid |% Water! Vol. to wt. conversion ! If used for fuel, (pounds/gailon) chlorine content (PPM) ! BTU per pound Lig-Othr (3) 10:10 0.0 Generation rates. Supply all rates in kilograms. Maximum amount stored onsite Monthly maximum (kg) Maximum days stored Annual average (kg) (ka) 2,400.0 20.700.0 4.800.0 90 7. DOT shipping name DOT hazard class 1001 ID code WASTE FLAMMABLE LIQUID Radioactive :995 8. Describe generation process. A SOLVENT MIXTURE OF 75% TOLUENE/25% METHYL ISOBUTYL KETONE IS USED TO FLUSH AND CLEAN PAINT EQUIPMENT. ADDITIONALL Y SCRAP PAINT-OFF-SPEC-IS COLLECTED WITH THE FLUSH SOLVENT. MASTE IS A NIXTURE OF FLUSH SOLVENT FROM CLEANING AND OFF-SPEC. PAINT. MASTE IS PROCESSED IN AN ON-SITE SOLVENT RECOVERY UNIT. Chemical Characteristics. Concentration units. For EP toxic and Flash point Reactive code TCLP wastes, use PPM. 2 volume( ),  $\frac{\pi}{2}$  weight( ), PPM( ) 141 Major and hazardous constituents. Give range of values at right. lower value upper value TOLUENE 75 Б. METHYL ISOBUTYL KETONE 20 25 đ. 10. If this waste is recovered, reclaimed, recycled or reused, describe how. UNDER VARIANCE WASTE IS RECYCLED IN SOLVENT RECOVERY UNIT ON-SITE. CN-0773 form Continues on the Back RDA 2203

DINILIE

#### HAZARDAUS WASTE FACILITY INSPECTION

Tempsco Corp. Plant 2 Jat and Pickett St. Dickson, Tempssee 37055

CONTRACTOR OF THE PROPERTY OF THE

INSPECTION DATE AND TIME

april 4, 1985 Starting at 9:00 a.m.

ALSON THE SID REFORDER.

Bob Gardner 701 Broadwy, 8401 #460/118, Tennessee 37219-5403 (615) 742-6649

CHEROLISTON CHEROLICATION

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THE VERY OF THE PROVIDE

This routine full inspection was conducted to evaluate rennacels compliance with the ap-Nicetus requirements of the Rules Coverning Rakardous Waste Hanagement in Tennessee,

The state of the section

CAN DESCRIPTION WASTE IN GENERATED STITUTE TO ACTION & FIRMADIS LIQUID DDDI CONSISTING OF SECURITY STATES AND DESCRIPTION AND

No the Plan of Inspection at to 90 drums of Seste May on Hand, Plans are being made to

BAXARDOUS WASTE FACILITY INSPECTION Tenneco Corp. Page 2

#### INSPECTION FINDINGS

The following violations of Rule 1200-1-11-.03 were found at the time of inspection:

Rule 1200-1-11-,03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-,07 provided that the generator assures that the personnel training program, at a minimum be designed to ensure that employees are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems including where applicable; (i) procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment, (2) key parameters for automatic waste feed cut-off systems (if any), (3) communications or alarm systems; (4) response to fires or explosions, (5) response to ground-water contamination incidents; and (6) shutdown of operations, (0107)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-:07 provided that the generator assures that the personnel training program be reviewed annually by all employees who handle or manage hazardous waste. (0125)

Maie 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing the job title for each position related to hexardous waste management and the name of the employee filling such job. (0126)

Mule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days of less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written job description for each position related to hazardous waste management.

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or loss without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written description of the type and amount of both introductory and containing training that will be given to each employee who handles or manages hazardous waste. (0120)

Rule 1200-1-11-,03(4)(b)1(iv) allows a generator to accumulate hezardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-,07 provided that the generator maintains records that document that all the required permitted training or job experience has been given to and completed by the employees who handle or manage hazardous whate. (0135)

Rile 1200-1-11-.03(8)(b)1(1v) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 proyided that the generator retains training records on current employees who handle of same materials waste while hazardous waste is being accumulated. Training records or former amployees must be kept for at least three years from the date the employee last scraed at the position which handles or manages hazardous waste; Personnel training records at generally an employee transferred within the same company; (0105)

HAZARDOUS WASTE FACILITY INSPECTION Tenneco Corp. Page 3

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator designs his contingency plan to minimize hazards to public health or the environment from fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. (0157)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the actions employees must take to immediately respond to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the accumulation area(s). (0165)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) will immediately; activate internal alarms or communication systems, where applicable, to notify all other affected employees; and notify appropriate State of local agencies with designated response roles if their help is needed. (0166)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is a release, fire, or explosion the emergency coordinator will immediately identify the character, exact source, amount, and areal extent of any released materials. He may do this by observation or review of facility records and if necessary, by chemical analysis. (0167)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will concurrently assess possible hazards to public health or the environment that may result from a release, fire, or explosion. This assessment must consider both direct and indirect effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions. (0168)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will immediately notify appropriate local authorities and the Tennessee Emergency Management Agency, if he determines that the facility has had a release, fire, or explosion which could threaten public health or the environment outside the facility, and then be available to help the appropriate officials decide whether local areas should be evacuated. (0169)

Rule 1200-1-i1-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, during an emergency, the emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, collecting and containing released waste, and removing or isolating containers. (0171)

HAZARDOUS WASTE FACILITY INSPECTION Tenneco Corp Page 4

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, immediately after an emergency, the emergency coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility, (0173)

Rule 1200-1-11-,03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-,07 provided that the generator's contingency plan describes how the emergency coordinator will ensure that, in the affected accumulation area(s); no waste that may be incompatible with the released material is stored in the accumulation area until clean-up procedures are completed; and all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before hazardous wastes are stored in the affected accumulation area(s), (0174)

Rule 1200-1-11-,03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-,07 provided that the generator's contingency plan describes how the generator will notify the Commissioner, and appropriate local authorities, that the cleanup procedures have been completed and all emergency equipment has been cleaned and fit for its intended use before hazardous waste are stored in the affected accumulation area(s), (0175)

Rule 1200-1-11-,03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-,07 provided that the generator's contingency plan describes how the generator's will note in his files the time, date, and details of any incident that requires implementing the contingency plan and how, wihtin 15 days after the incident, he will submit a written report on the incident to Commissioner. (0176)

Rule 1200-1-11-.03(4)(1)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, as appropriate for the type of waste handled at the accumulation area and the potential need for the services of these organizations. (0177)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan lists the names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator and keep this list up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. (0185)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes the location, a physical description and a brief outline of the capabilities of each item on the list of emergency equipment at the accumulation area (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and extarnal) and decontamination equipment), where this equipment is required. (0197)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes an evacuation plan for employees where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes, (in cases where the primary routes could be blocked by releases of hazardous waste or fire). (0205)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains a copy of the contingency plan and all revisions to the plan and submits them to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. (0207)

Rule 1200-1-11-.03(4)(b):1(i) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator, if the waste is stored in containers, ensures that containers holding hazardous waste are always kept closed during storage, except when it is necessary to add or remove waste. (0447)

Rule 1200-1-11-.03(4)(b)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. (0515)

Rule 1200-1-11-.03(4)(b)1(iii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that while hazardous waste is being accumulated on-site each container and tank is labeled or marked clearly with the words "HAZARDOUS WASTE". (0525)

Rule 1200-1-11-.03(4)(L)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator accumulates the hazardous waste in a manner which will minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten public health or the environment. (0535)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a primit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the accumulation area(s) is equipped with a devise, such as a telephone (immediately aveilable at the scene of accumulation) or a hand-held two way radio, capable of summoning emergency assistance from local police departments, fire departments, or State and local emergency response teams, unless none of the hazards posed by the waste accumulated warrent this kind of equipment. (0555)

Rule 1200-1-11-.07(1)(b)1(i) prohibits a new hazardous waste management facility, in Tennessee, from treating, storing or disposing of hazardous waste unless the owner or operator has a permit under the Tennessee Hazardous Waste Management Act. (3500) Waste on hand had been stored more than 90 days.

| SIGNED:  | 1201 1    |       |         |
|----------|-----------|-------|---------|
| STOMETER | Bollandne | DATE: | 4-12-85 |

#### **PUBLIC NOTICE**

The Commissioner of the Tennessee Department of Health and Environment is hereby giving notice of this tentative decision to grant a variance from classification as a waste, for spent flush solvent, Hazardous Waste Code D001, as generated at Tennsco, Plant 2, TND 980845390, corner of 1st Street and Pickett in Dickson, Tennessee 37055, because this hazardous material is recycled in a manner which will not pose a significant hazard to public health or the environment. This variance will only apply to the material identified in the request and only when it is managed as described in the request.

Tennsco Corporation at their Plant 2 generates spent solvent in their painting process. The spent solvent is recovered on-site by a distillation process and reused as it was originally used. The on-site recovery and reuse of this hazardous waste will reduce the risk to health and environment associated with hazardous waste transportation and disposal.

The procedures for determining that certain hazardous materials that are being recycled will no longer be classified as wastes are provided in Tennessee Rule 1200-1-11-.01(4) Variance from Classification as a Waste.

Comments and/or requests for a hearing on this tentative decision will be accepted for 30 days ending at 4:30 p.m. <u>OCT 19 1987</u>.

Comments or requests for a hearing should be sent to: Mr. Tom Tiesler, Director, Division of Solid Waste Management, Tennessee Department of Health and Environment, Customs House, 4th Floor, 701 Broadway, Nashville, Tennessee 37219-5403; phone (615) 741-3424.

The Commissioner will issue a final decision to either grant or deny the variance after receipt of comments and after the hearing (if any).

If you wish to review the draft variance, or wish further information, please contact: Division of Solid Waste Management Field Office, Tennessee Department of Health and Environment, Customs House, Room B-01, Nashville, TN 37219-5403; phone (615) 741-5654.

TY/ah/SW-154

DSWM LEC

#### INSPECTION REPORT

#### SITE/OPERATION INSPECTED:

Tennado Corporation - Plant II & III IND 98 084 5220 F.C. Ec. 605 Dachson, Tt. 27035

#### OWNER/OPERATOR/PRIMARY CONTACT:

Micky Self

#### DATE AND TIME OF INSPECTION:

November 28: 1280 -

#### REPORT PREPARED EY:

Ten Gelder 701 Endadlag, D.D. Nash 1118. TV STRIB-E-CT 1818 TRI-DOC:

#### NAMES AND AFFILIATIONS OF OTHER INSPECTION PARTICIPANTS:

Lu-n

#### PURPOSE OF INSPECTION:

This filting inschediled inspection was conducted to evaluate lenses a compliance with the applicable requirements of the Size So ecoung Bezardous waste Management in Tennesses,

#### FACILITY DESCRIPTION:

Tennaco Flant II and III manufactures office cebinets. The hazardous lasts generated at these plant is a DOOL waste solvent. Tennaco has a variance for the recovery of the solvent of this waste.

#### INSPECTION FINDINGS:

"In vib.alions were apparent during the inspection, All the conditions of the variance were met at the time of the inspection.

Jon bolh

Brance Jacob

December 8, 1987

-See full instructions for form PH-2022 for additional information Organisation's name. TENNSCO CORPORATION (PLANT 1) VARIANCE GRANTED TMD 00-403-5853 DURING 1987 Waste name. | Waste stream: ID FLUSH SOLVENT 3. Give years waste generated | Date stopped | Frequency of generation 1963 CONTINUOUS 4. Mark all appropriate hasard criteria below. | EPA waste codes | SIC Ignitable (a), EP toxic (b), Corrosive (c), Reactive (a), Other toxic (i) CODESI AT 17005 DOOL Physical form 5. |% Solid|% Water|Lb./gel. | Chlorine PPM | BTU/1b. LIQUID, OTHER BASED | 010.01 10008.000 1 Generation rates in kilograms. Monthly maximum | Annual average | Max. amount stored | Max. days stored 2,400 20,700 4,800 7. DOT shipping name DOT hazard class | DOT ID code WASTE FLAMMABLE LIQUID FLAMMABLE LIQUID 1993 Describe generation process. WASTE IS A MINTURE OF FLUSH SOLVENT FROM STEANING AND OFF- SPEC PAINTS PROSE AND CHERT THEMS SCOOP NAME AND ADDRESS OF THE PROPERTY SPECTS COSTECTED WITH THE PLUSH COLUBRY. WASTE IS PROCESSED IN AN ON-SITE SOLVENT RECOVERY UNIT. ANNUAL REPORT SECTION \*\* LIKES 9-11 Report | Amount generated | Amount on site on | Amount on site on Year during year (kg) | first day (kg) 1987 29.500 • ~200. Amount Nandled |Handled | TSDT handling/Waste On site? management methods (1) HO9 d5.319 Y N 4181 C | BALANCE MANAGED D | UNDER VARIANCE | Y N | Check the efforts undertaken to reduce the volume and toxicity in the 10. generation of this waste during the reported year. Reformulation/redesign of product a( ) d. Substituting raw materials dor b. In process recycling. . . . . b( ) Other - explain below: . . . . . g( ) N/A - VARIANCE GRANTE 11. Describe changes in volume and toxicity that those reduction afforts checked in line 10 produced last year compared to the previous year. more toxic-a( ) h. less toxic-b( ) c. No change-c( ). | Aut of Reduction NIA - VARIANCE GRANTED. (kg)

Beduction

as full instructions for form PH-2022 for additional information and codes. Organisation's name. EPA ID CODE TENNECO CORPORATION (PLANT 1) TMD 00-403-5853 Weste name: NON HAZARDOUS WASTE | Waste stream ID WASTE PAINT (1) DROP FROM LISTING. Give years waste generated | Date stopped | Frequency of generation 1963 CONTINUOUS Mark all appropriate hazard criteria below. [EPA waste codes | SIC Ignitable (a), EP toxic (b), Corrosive (c), Reactive (a), Other toxic (f) CODES! A 10000 Physical form 5. |X Solid|X Water|Lb./gal. | Chlorine PPH | BTU/lb. LIQUID, OTHER BASED | 075.01 10311.000 1 6. Generation rates in kilograms. Monthly maximum | Annual average } Max. amount stored | Max. days stored 2,150 18,000 7. DOT shipping name | DOT hazard class | DOT ID code WASTE PLANMABLE LIQUID PLAMMABLE LIQUID 1993 Describe generation process. THIS MATERIAL ORIGINATED FROM THE WALLS OF THE PAINT BOOTHS AND RESULTS FROM HIGH SOLIDS PAINTS BEING SPRAYED. PREVIOUSLY THIS MATERIAL WAS MANAGED AS A HAZARDOUS WASTE BECAUSE OFF-GRADE PAINT WAS MIXED WITH THES WASTE. THE ATTACHED LAB ANALYSES VERIFY MATERIAL TO BE NON-HAZARDOUS. \*\* ANNUAL REPORT SECTION \*\* LINES 9-11 9. Report | Amount generated | Amount on site on | Amount on site on Year during year (kg) | first day (kg) | last day (kg) 1987 |Amount Handled Handled TSDF handling/Nacta On site?! management methods Y N YH Y N Check the efforts undertaken to reduce the volume and toxicity in the 10. generation of this waste quring the reported year. **a**. Ъ. Other - explain below: 11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year, a. more toxic-a( ) b. less toxic-b( ) c. No change-c( ). | Amt of

Genera for Hazardous Waste Annual Shipping Report (Por wastes shipped off-site only.) 1987

| tear (Out Supping Name / Usste name) WASTE FLAMMOLG LIB.   |  |  |  | Tennesser Orpartae<br>Division of Solid I<br>Lustons House, Fou<br>701 Broadway<br>Mashville, Tenness  | Tennessee Department of Health and Environment Unition of Solid Waste Management (UNIONS House, Fourth Floor Masseent Masshville, Tennessee 37219-5403   | 100  |
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| Out Supping time / Ussie name Waste Flammete Ling.   | :  |  | so, compl<br>r technic   | ete this form when a<br>al assistance, call  | Also, complete this form when terminaling business. For technical assistance, call \$ (500) 237-7016 in Tennesse   | (1) E  |
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Hazardous Waste Notification Summary

DSWM LIC JAN 06. 1989

|            | The form PH-2   | 019A for additional : | information and codes. |
|------------|---|-----------------------|------------------------|
| 1,         | Organization's name   |                       | - Vaes                 |
| •          | TENNSCO COPPORATE   | •                     |                        |
|            | TENHSCO CORPORATION (PLANT 223)   |                       | EPA ID CODE            |
| 2.         | Mailing address   |                       | TND 98-084-5390        |
|            | PO BOX 606  | City                  |                        |
|            |   | DICKSON 27 1          | QQQ   State Zip        |
| 3.         | Physical leads  | sicketti si           | TH 37055               |
|            | Physical location or address<br>IST & PICKETT ST  | Si.                   |                        |
|            | G FICKETT ST  |                       | 1 County name          |
|            | Latitua   | •                     | DICKSON                |
|            | Latitude   Longitude  |                       |                        |
|            | .0000   |                       |                        |
| 4.         | Owner name  |                       |                        |
| **         | AMMER NAME  |                       | •                      |
|            | LESTER D SPEYER   |                       | Phone                  |
| ě          | White   | •                     | (615) 446-800          |
| <b>J</b> . | MANAGER OR operator name  | . :                   | (010) 446-800          |
| •          | ROY STINSON   |                       | Phone                  |
| à.         |   |                       | fairs on a second      |
| <b>5</b> . | Principal technical contact   |                       | (615) 446-800(         |
|            | MICKEY SELF   | ••                    | 1 22                   |
|            |   | •                     | l Phone                |
| 7.         | Number of employees   Year began  |                       | (615) 446-8000         |
|            | 187 1980  | ISIC codes            | 1 2.2                  |
|            |   | 2542,                 | Job shop               |
|            | Emergency contacts  |                       | NO                     |
|            | Nama  |                       | . •                    |
|            | A ROY STINSON   | Time period cove      | rad I                  |
|            | B JENELL LOGGTHS  | акон                  | red   Phone            |
|            | C LARRY DUNN  | HOME                  | (615)446-3471          |
|            | D MICKEY SELF   | Home                  | (615)446-4564          |
|            |   | HOME                  | (615)446-9432          |
| ن ا        | Current environments  |                       | (615)789-5618          |
| ive        | Permit tune Transporter permits to  | I bir, water, and     | * * *                  |
|            | Current environmental permits for permit type, number and expirat write by giving the first and lates permits and lates and lates and lates and lates are considered. | ion date and ra       | liological permits.    |
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|            | 334302P, 394302P, ARD 9   | 94303P                |                        |
| ð.         | I coresto atal and  |                       |                        |
| . :        | Signature this information  | is true. nonum.       |                        |
| ٠'         | I certify that this information :<br>Signature of authorized represent  | tativo, 4441          | complete.              |
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| la.        | N 18 AND DESCRIPTIONS OF PERSONS  | FEETINE ASST          | J - 25 - 66            |
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|            | County   Priority   6   | enerator i esse       | ·                      |
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Date regulated /00/00

13. Comments

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FF8 99 1989

| 1.             | Organization's name.   | or additional information and codes.   |   |
|----------------|--|--|---|
| 1              | TENNERS ASSESSED.  |  |   |
| ,              | TENNSCO CORPORATION (PLANT 283)  | EPA ID CODE  |   |
| 2.             | Waste name.  | 70 404 3330  |   |
|                | FLAMMABLE LIQUID   | Waste stream I   | D |
| 3.             | Give years waste com   | (1)  |   |
|                | Give years waste generated   Date (SINCE 1980) 4 YEARS   | CUNTINHNIE   |   |
| 4.             | TOWNS THE MUDICIPATION TO THE TOWN IN THE  |  |   |
|                | Reactive (a). Other towing   | ive (c),   |   |
| •              | CODES! A   | 10001 (12542)  |   |
| 5.             | Physical form  |  |   |
|                | Physical form   X Solid   X Water LIQUID, OTHER BASED   75.0   | Lb./gal.   Chlorine PPN   BTU/lb.  |   |
| 6.             | Ganaration water and are   |  |   |
|                | nonthly maximum   Annual average   | Max. amount stored   Max. days stored  |   |
|                | 728 4,368  | 2,184 Max. days stored   | i |
| <b>Ž</b> .     | DOT shipping name  | 90   |   |
|                | FLANNABLE LIQUID   | DOT hazard class   DOT ID code   |   |
| <b>S</b>       |  | FLAMMABLE LIQUID 1993  | , |
| Ä*             | Describe generation process.   |  |   |
| : •            | BAD PAINT AND PAINT THINNER MIXED FO   | R PAINT EQUIPMENT CLEAN-UP   |   |
|                | ANNUAL REPORT STOTTON WW   |  |   |
| 9.}            | THE THE SECOND S |  |   |
| البينة         | Report   Amount generated   Amou | unt on site on   Amount on site on   |   |
|                | 1988   | t day (kg)   last day (kg)   |   |
| !              | limnund vanara   | ' 0  |   |
|                | Amount Handled   Handled   On site   | TSDF handling/works  |   |
|                |  | The second secon |   |
|                | i on sale:   | ?! management methods  |   |
| :              | , , , , , , , , , , , , , , , , , , ,  | nanagement methods   |   |
| :              | A C Y H Y H Y H  | management methods   |   |
| <b>)</b> .     | A C Y N Y N Y N  | management methods   |   |
| ٥.             | A   O   Y N B   Y N C   Y N I Y N I Y N I Y N I Y N I Y N I Y N Check the efforts undertaken to redu   | management methods   |   |
|                | A   Y N B   Y N C   Y N I Y N I Y N Check the efforts undertaken to redu generation of this waste during the   | management methods   |   |
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|                | A Y N B Y N C Y N C Y N Check the efforts undertaken to reduce the efforts undertaken to reduce the generation of this waste during the Reformulation/redesign of product at In process recycling  | management methods   | ) |
|                | A Y N B Y N C Y N C Y N Check the efforts undertaken to reduce the efforts undertaken to reduce the generation of this waste during the Reformulation/redesign of product at In process recycling  | management methods   | ) |
|                | A Y N B Y N C Y N C Y N D Y N Check the efforts undertaken to reduce the efforts undertaken to reduce the second of this waste during the Reformulation/redesign of product at In process recycling  | management methods   | ) |
| b.<br>s.       | A Y N B Y N C Y N C Y N D Y N Check the efforts undertaken to reduce the efforts undertaken to reduce the second of this waste during the Reformulation/redesign of product at In process recycling  | management methods   | ) |
| b.<br>e.<br>g. | A Y N B Y N C Y N C Y N D Y N Check the efforts undertaken to reduce the efforts undertaken to reduce the second of this waste during the Reformulation/redesign of product at In process recycling  | management methods   | ) |
| b.<br>e.<br>g. | A Y N B Y N C Y N C Y N D Y N Check the efforts undertaken to reduce the efforts undertaken to reduce the second of this waste during the Reformulation/redesign of product at In process recycling  | management methods   | ) |
| b.<br>e.<br>g. | A Y N B Y N C Y N C Y N D Y N Check the efforts undertaken to reduce the efforts undertaken to reduce the second of this waste during the Reformulation/redesign of product at In process recycling  | management methods  uce the volume and toxicity in the reported year.  d. Substituting raw materials d() e. Improved operations  | ) |
| b.<br>e.<br>g. | A Y N B Y N C Y N C Y N D Y N Check the efforts undertaken to reduce the efforts undertaken to reduce the second of this waste during the Reformulation/redesign of product at In process recycling  | management methods  uce the volume and toxicity in the reported year.  d. Substituting raw materials d( e. Improved operations   | ) |
| b.<br>B.       | A Y N B Y N C Y N C Y N D Y N Check the efforts undertaken to reduce the efforts undertaken to reduce the second of this waste during the Reformulation/redesign of product at In process recycling  | management methods  uce the volume and toxicity in the reported year.  d. Substituting raw materials d() e. Improved operations  | ) |
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| B.<br>B.       | A Y N B Y N C Y N C Y N D Y N Check the efforts undertaken to reduce the efforts undertaken to reduce the second of this waste during the Reformulation/redesign of product at In process recycling  | management methods  uce the volume and toxicity in the reported year.  d. Substituting raw materials d( e. Improved operations   | ) |

See full instructions for form PH-2022 for additional information and codes.

Organization's name. TENHSCO CORPORATION (PLANT 283)

EPA ID CODE TND 98-084-5390

Waste name. FLAMMABLE LIQUID

l Waste stream ID . (1)

12. Chemical Characteristics. Concentration units. For EP toxic | Flash point | Reactive code | wastes, indicate PPM.

Major and hazardous consituents.

| lower | upper

(3.) If this waste is recovered, reclaimed, recycled, or reused, describe how.

THIS WASTE IS NO LONGER GENERATED. MATERIALS ARE HANDLED IN AN ON SITE SOLVENT RECOVERY UNIT TOVERED BY A VARIANCE.

16. I certify that this information is true, accurate and complete. SIGNATURE! (Generator or authorized representative), title and date.

elow is for department use only. EXECTIVE ASST.

2-33-89 Yes No | Yes No | Yes No | Yes No Initials Status | Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Status Report Partial exemption (5); Hazardous (6); accidental (7); No longer generated (8); Variance granted (9); Condi-

tionally exempt (A); Mixed radiological wastse (R). 18. Comments.

> Variance granted Oct. 1987 Still Bottoms guien Special Data approval by Nay headle Lield Office much 1987



Waste Generators Och File BACPJEZEH 405 Shipping Report (For wastes shipped off-site only.) Annual 1988

of 150F Ibndl ing codes Also, complete this form when terminating tusiness. For technical desistance, call 1 (888) 237-7018 in Tennessee only. Execute Ass. To 2.22-09 Jennessee Department of Health and Environment Division of Solid Maste Management Customs Mouse, Fourth Floor 101 Broadway Mashville, Tennessee 37219-5403 Please complete and return this form to following address: Page 8861 franchister 6% to taker 1. Un'il footion: I cartily that the above information is true, account and complete, (50pp by parameter and give title and date.)  $\leq$ DN 10 naber MADIE Nation of shipments SHIMENTS Macunt shipped In killograms 4 BPA Moste codes TENNECD CORPORATION (PLANT 2%3) EPA ID CODE TAID 98-084-5390 TN 37055 WASI (Oct Shipping Name / Hoste name MICKEY SELF PO BOX 606 Maste stress DICKSON

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| Jennesses Department of Health and Environment, Division of Customs House - Fourth Floor, 70: Broadway, Nashville, IN 3  | Seport Solid Haste Management. 7219-5403                  |
|--|---|
| 1. Organization's full name at facility  |   |
| To was a firm  | EPA identification code                                   |
| ENNSCU CORPORATION  2. Maste nesse. Use standard name from regulations whenever possible.  | TND 980845390   |
|  | Wasta Stream number                                       |
| 3. Sive the years that this wette her harm I The LIQUID  | 1   |
| 3. Give the years that this waste has been   Date no longer generated.   (MY/DD/YY)  | frequency of generation                                   |
| 1990-0   | Company   |
| c. Circle ell appropriate hazard criteria below.   EPA waste codes. (Primaru   | first)   SIC code for generating                          |
| CONTRACTOR (C) COPYOS (C)  | process.  |
| S. Physical form   Percent   Vol. to wt. conversion   7  | 005 7542  |
| OLIGUID SO (pounds per gallon) chlorine cor  | used for fuel. STU per pound PPR N/A /lb.                 |
| To the state of th | d on site Naximum days stored                             |
| 12,750, (kg) Annual everage (kg)   |   |
| 7. BOT shipping mane DOT hazard class  | (kg) NA   |
| WASTE FLAN.  | 00T 10 code   |
| S. SESCRIBE GENERALISM PROCESS.  | 07 UN 1993  |
| OTHIS ONE TIME COMPANY   |   |
|  | DISPOSE OF  |
| PAINT RAW MATERIALS DUE TO A PROCE<br>USING THIS PAINT.  | SS SHUTDOWN   |
|  |   |
| resulting notification. Continue with line 12.   | ng business for a waste which                             |
| sprantos weste generators. For handling in a permitted facility, use "I", instructions. For other handling, use "i" codes from instructions.   | bmit Annual Shipping Report for<br>"S", or "D" codes from |
| during year (bn) Amount on site on Amount on   | site on   |
| first day of year (kg) last day o  | f year (kg)   |
| Sharp Head   |   |
| Amount Handled Handled 130F handling/Heate Amount Handled   Hendled   Hendle |   |
|  | site? Management methods                                  |
| Amount Handled   Handled   TSDF handling/days  |   |
| e Y/N Abragament methods d   | site? management methods                                  |
| 19. Check the efforts undertaken to reduce the police and envicity in the general the resorted year. This reduction refers to generation processes and not tree.  a. Reformulation/redesign of product. a( ) d. Substituting raw material b. In process recycling.  b. In process recycling.  c. Equipment/technology modification (c) f. No effort.   | als d( )  |
| To have a small admit a direction of the state of the sta | · · · · · · · · · · · · · · · · · · ·                     |
| 5. Other - englain below g( )  | ,   |
| The state - states of states and states are states as a state of states are states are states as a state of states are states are states as a state of states are states are states as a state of states are states are states as a state of states are states |   |
| \$ g( )  |   |
| 11. Describe changes in volume and toxicity that those reduction efforts describe common to the previous year.   |   |

PH-2022(SHM 11/87 Rev.)

|  | s full name at fac  |   |  |  |   | Waste Managem<br>1403<br>entification code  | ·  |
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| 180050   | O CORP  | PORATION  |  |  | 1.  |   | . سم ز   |
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TDD 98-284-5390 ZZ-40



OEG 07 1882 CNS 1218

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# STATE OF TENNESSEE DEPARTMENT: OF ENVIRONMENT AND CONSERVATION NASHVILLE ENVIRONMENTAL FIELD OFFICE 537 BRICK CHURCH PARK DRIVE NASHVILLE, TENNESSEE 37283-1550

December 2; 1992

Hr. Hickey Seli Element Corporation 201 Tennaco Drive P. U. Box 606 Dickson, Tennessee 37055-0606

Re: Drum dump site on Tennsco Property (behind-former Winner Bost Plant)

Dear Mr. Self:

On December 1, 1992 Jim Cornvell and I met with you and Tennsco staff where we inspected the drum dump site on Tennsco property lienard the former Winner Boat Plant. We observed discolored soil and deteriorated barrels, many of which contained a hardened resin, in two (2) cells which are located some 100 behind the building. One cell had been partially disturbed, but you informed me that no waste had been removed.

The Division of Solid Waste Management requires that certain precautions be taken during the remediation process. As waste is removed from the cells, and different waste types are encountered, separate staging or holding areas are required prior to running analysis. It indeed, there is more than one (1) waste type, then representative sampling can easily be performed on each waste type to determine if it is hazardous. Also, after the waste is totally removed from the cells, soil samples must be taken on the bottom of the cells to assure that a proper closure has been achieved. If soil discoloration is visible in certain areas after removal of the waste, a TCLP as well as a total analysis would be in order.

After this is done, please contact me for a follow-up inspection of the site.

Also, after re-inspecting the site and reviewing sil smallytical date, the

Division will consider your request for a special waste permit.

If there are any questions please contact me at (615) 741-0654.

Sincerely,

Wayne Harlin

Wayne Harbin Division of Solid Waste Management

BHI/ED

Plazardous Waste Stream Report

Department of Environment and Conservation, Division of Solid Waste Management.

Fifth Floor, L & C Tower, 40.1 Grover Street, Nashville, TN 37243-1536 lete a core for your excerts. entraction's full name at facility. TOTAL CHEMICA PLAN 2/1 EPA identification code THO 98-184-5590 wate rame. Use standard name from regulations whenever possible. Author (1999) Waste Stream number eive the years that this mate has been ! Date no longer pomerated. Frequency of generation MART 1881 4 FEEL (0) Continuous Accidentaly Various One time

Circle all appropriate hazard criteria below. EPA waste codes. (Primary first; SIC code for generating process.)

Six maximum.)

Mayaical form | % Solid | % Water | Yol. to wt. conversion | Characteristics | Ch

Contraction rates. Supply all rates in kilograms.

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Annual average (kg)

Z. 184.0

DOT hazard class DOT 10 code

Flat. 1/9015 OF 1993

L. Searibe presidion process.

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DELETE THIS STREAM

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FEB 1 7 1994

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# 1994 Offsite Shippir Report

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Assistance 2-2-95 REVISER 2-8-95

RDA 2203

# Hazardous Waste Notification

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CB 07/3 (Rev. 1195)

FDA 2203

Hazardous Waste Stream Report
Temessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535
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RDA 2203

EXEC. ASST



### **RCRA Inspection Report**

#### insection and Author of Report

Tom Yates, Environmental Specialist

#### facility information

Tennsco Plant 2/3 PO Box 606 First & Pickert Street Dickson Tennessee 37056 TND 98-004-5390 (615) 446-8000

#### Legensible Official

Mickey B. Self

#### innection luticipants

Ed Owens, Tennsco Woody Adams, Tennsco

#### the list Time of Inspection

February 7, 1996 Approximately 8:30 a.m.

#### Applicable Regulations

Tennessee's Hazardous Waste Management Regulations (Tennessee Rule Chapter 1200-1-

#### PHONE OF REPORT OF

To conduct an unannounced hazardous waste generator compliance evaluation inspection to determine Tennsco's compliance status with Tennessee's Hazardous Waste Management Regulations.

#### lesing Description

Tenneco manufactures metal welded cabinets, lockers, shop equipment and filing cabinets. Tenneco was originally Diebold Company and began operation in 1958. In January 1962, Diebold sold the company and it became Tenneco. Tenneco is comprised of six separate facilities located in Dickson and employs approximately 300 people. Plant 2/3, the object of this inspection, consists of two buildings located on one communes site and is considered one facility, has one EPA identification number, and is referred to as Plant 2/3 to acknowledge that there are two production buildings on the site. The Plant 2/3 buildings were acquired in 1980 and production began around that time. The production processes

used at Plant 2/3 include stamping, welding, shaping and painting. The hazardous wastes are generated from the painting processes. The paint processes used in Plant 2 of the Plant 2/3 facility include electrostatic spray paint booths, hand spray areas, and robotics spray areas. The paint processes used at Plant 3 of the Plant 2/3 facility include an electrostatic disk system, a hand spray area and a high solids baking enamel paint. A new powder paint system is being installed and expected to be operating in the near future. Tennsco anticipates a significant hazardous waste reduction to result from the change to the powder paint system. Paint waste from overspray and waste from cleaning paint equipment are the hazardous waste generated from the painting processes. Drums used for satellite accumulation of these hazardous wastes are located near the painting equipment. When possible, paint wastes are reused by blending with new paint. Waste not reused is shipped off site as hazardous waste. A review of the annual report data submitted in 1995 shows Tennsco Plant 2/3 generated over 1000 kg of hazardous waste per month for 12 months in 1994. A review of the manifest shows M & M Chemical and Equipment Company and Fisher Industrial Services were used for transportation, treatment and/or disposal of their hazardous waste.

A small amount of waste oil is generated from equipment maintenance. This is handled by Industrial Oil Service and M & M Chemical and Equipment Company.

#### **findings**

The following violations were noted during this inspection:

Rule 1200-1-11-,03(4)(e)

- Except as provided in parts 6, 7 and 8 of this subparagraph, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:
  - (ii) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;
  - (iii) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste".

The main hazardous waste accumulation area where hazardous waste is accumulated prior to offsite shipment was found to have, based on Mr. Self's and my count, 36 drums containing hazardous waste which had no labels, hazardous waste markings and were not marked with the required accumulation date. This violation is considered high priority and subject to continued enforcement action irrespective of the correction date given in the accompanying Notice of Violation.

Take the necessary steps to see that all drums and containers of hazardous waste are always properly marked, labeled and dated.

#### Rule 1200-1-11-.05(3)

- (c) Required Equipment All facilities must be equipped with the following, unless none of the hazardous posed by waste handled at the facility could require a particular kind of equipment specified below:
  - I. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;
  - A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police department, fire department, or State of local emergency response teams;
  - Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, mert gas, or dry chemicals), spill control equipment, and decontamination equipment.

The main hazardous waste accumulation and storage area between the fabricating building and paint storage building did not have an alarm or emergency communication system immediately available at the scene of operations and adequate spill control equipment was not provided.

If a phone or similar devise is used for emergency communication it should be located near enough to the accumulation area to be immediately available. If a two-way radio system is used a definite procedure for its use should be established to insure it will be effective and in good working condition if needed. This procedure should be demonstrable at inspections.

#### Rule 1200-1-11-.05(3)

(f) Required Aisle Space. The owner or operator must maintain aisle space to allow the undistructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Attile space for unobstructed movement of emergency equipment was not provided in the

The hazardous waste drums and containers in the accumulation area should be organized and meintained so that there is adequate aisle space for unobstructed access by emergency equipment and so labels, markings, etc., are clearly visible. A definite area or space where nazardous waste containers will be placed should be designated. Signs, painted lines, fences and similar items are useful in accomplishing this.

#### Rule 1200-1-11-.05(9)

(e) <u>Inspections</u> - The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

Weekly inspections of hazardous waste containers and the hazardous waste accumulation area and a log of these inspections was not done.

Inspect the hazardous waste accumulation area and containers at least once a week and maintain a log which will at least include date and time of the inspection, the name of the inspector, a notation of the observations made and the date and nature of any repairs or other remedial actions.

#### Rule 1200-1-11-.03(4)(e)

- 5. (i) A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acute hazardous waste listed in Rule 1200-1-11-.02(4)(b), (c), or (d)5 in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with part 2 of this subparagraph provided he:
- (II) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

Satellite containers used for the accumulation of hazardous waste near the point of generation were not marked "Hazardous Waste".

Mark all containers used to accumulate and/or collect hazardous waste with the words "Hazardous Waste".

The contingency plan that was reviewed at this inspection was dated March 1993. It is recommended this plan be reviewed and up dated as needed. A record of this review should be attached to the plan.

The Waste Reduction Act of 1990 requires that an annual progress report be completed which shall:

- (1) Analyze and quantify progress made, if any, in hazardous waste reduction, relative to each performance goal established under Section 305(b); and
- (2) Set forth amendments, if needed, to the hazardous waste reduction plan and explain the need for the amendments.

Complete a waste reduction progress report which includes the above information.

Tennsco Plant 2/3 Page 5

I appreciate the time and cooperation I was given during my inspection. If there are any questions regarding this report contact Tom Yates at (615) 299-9922.

Signed

Name of Inspector

Jeb. 12, 1996

TDY/Tenn 188A/db

ec: Solid Waste Management Central Office U.S.E.P.A. -- Region IV

# STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

1/9/97

| IN THE MATTER OF: | )   |                       | DSWM |
|-------------------|-----|-----------------------|------|
| TENNSCO CORP.     | . } | DIVISION OF SOLID     | r;c  |
| EMISCO COM.       | . ) | WASTE MANAGEMENT      |      |
|                   | )   | SWM CASE NO. 96-H0023 |      |
| RESPONDENT        | Ş   |                       |      |

#### **ORDER AND ASSESSMENT**

Comes now, Justin P. Wilson, Commissioner of the Department of Environment and Conservation, and states that:

#### **PARTIES**

1

Justin P. Wilson is the Commissioner of the Tennessee Department of Environment and Conservation, (the 'Department') and among other duties and responsibilities, is charged with the responsibility for administering and enforcing the Tennessee Hazardous Waste Management Act (T.C.A. Section 68-212-101 et seq.).

11.

Tom Tiesler is the duly appointed Director of the Division of Solid Waste Management (the 'Division') He has received written delegation to administer and enforce particular aspects of the <u>Tennessee Hazardous Waste Management Act.</u>

111.

Tennsco Corp (hereinafter referred to as the 'Respondent' or 'Tennsco'), is an active company conducting business in Dickson, Tennessee. Its agent for service of process is Mr Keith C Stanton, 201 Tennsco Drive, Dickson, Tennessee 37055.

#### **JURISDICTION**

IV.

Pursuant to Tennessee Code Annotated (hereinafter "T.C.A.) Section 68-212-114(b), the Commissioner may assess a civil penalty of up to FIFTY THOUSAND DOLLARS (\$50,000) per day for each day of violation of the Tennessee Hazardous Waste Management Act (the "Act"), or any rules and regulations promulgated pursuant to the Act, against any person who violates the Act or rules or regulations. In addition, the same statute authorizes the Commissioner to assess damages which may include any reasonable expenses incurred in investigating and enforcing the Act. T.C.A. Section 68-212-111 authorizes the Commissioner or his authorized representative to issue an Order for Correction to responsible parties for violations of the Act or rules or regulations promulgated thereunder.

V.

The Respondent is a "person" within the meaning of T.C.A. Section 68-212-104 and has violated provisions of the Act and the rules.

#### FACTS

VI.

The Respondent is a manufacturer of metal welded cabinets, lockers, shop equipment, and filing cabinets. The facility is comprised of six separate facilities located in Dickson, and employs approximately 300 people. Plant 2/3, the object of the inspection, consists of two buildings located on one continuous site and is considered one facility, with one EPA identification number. It is referred to as Plant 2/3 to acknowledge that there are two production buildings on the site. The facility is a fully regulated generator, and as such, may store hazardous waste on-site for less than 90 days without a permit, provided that specific provisions of the hazardous waste regulations are met. The Respondent's EPA identification number is TND 98-004-5390.

#### VII.

On February 7, 1996, a routine Compliance Evaluation Inspection (CEI) of a Large Quamity Hazardous Waste Generator was conducted at Tennsco Plant 2/3 in Dickson, Tennessee. On February 12, 1996, the Division issued Tennsco a Notice of Violation (NOV) for the violations cited on the aforementioned inspection. Following issuance of the NOV, the facility was invited to meet with the Division in a show cause meeting to discuss the alleged violations. The meeting was held on May 23, 1996. During the show cause meeting, a review of the hazardous waste manifests indicated that the company had complied with the 90-day storage requirements, but not the labeling requirements. In fact, the facility failed to properly label and place accumulation start

dates on thirty-six (36) drums. The other cited violations were demonstrated to have come under compliance since the inspection. **YIDLATIONS** VIIL The Respondent is charged with having violated the following regulations promulgated under the Tennessee Hazardous Waste Management Act and its regulations. IX. By failing to properly label and date accumulation storage drums, the facility violated Rule 1200-1-11-03(4)(e)2, which states: Except as provided in parts 6,7, and 8 of this subparagraph, a generator may accumulate hazardous waste on site for 90 days or less without a permit or without having interim status, provided that: (ii) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each comainer, (iii) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste." By failing to document inspections on the hazardous waste accumulation area, the facility violated Rule 1200-1-11-03(4)(e)2(1)(1) which in turn refers to 40 CFR 265-174, incorporated by reference at Rule 1200-1-11-,05(9)(a), which states: The owner or operator neust inspect areas where containers are stored, at least weekly, looking for leaks and for deferioration caused by corrosion or other factors. By failing to have installed the proper emergency claim system, communications equipment, and spill control equipment, the facility violated Rule 1200-1-11-03(4)(e)2(iv) which in turn refers to 40 CIR 265.32, incorporated by reference at Rule 1200-1-11-05(3)(a), which states: All facilities must be equipped with the following, unless none of the luzards posed by waste liandled at the facility could require a particular kind of equipment specified below: An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel, A device such as a felephone (immediately available at the scene of operations) or a hand-held (wo way radio, capable of summoning emergency

assistance from local police departments, fire departments, or State or local emergency response teams:

(c) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment; and

(d) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.

#### XII.

By failing to provide adequate aisle space in the accumulation area, the facility violated Rule 1200-1-11-.03(4)(e)2(iv) which in turn refers to 40 CFR 265.35, incorporated by reference at Rule 1200-1-11-.05(3)(a), which states:

The owner or operator must maintain adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

#### ORDER

WHEREFORE, PREMISES CONSIDERED, pursuant to the authority vested by T.C.A. Section 68-212-114 and T.C.A. Section 68-212-111, I, Tom Tiesler, acting as the authorized representative of the Commissioner, hereby, after proper consideration of the harm done to the public health or the environment, the economic benefit gained by the violator, the amount of effort put forth by the violator to attain compliance, and any unusual or extraordinary costs incurred by the Commissioner, ORDER that:

- The Respondent shall fully comply with Act and Division Regulations in the future.
- The Respondent is assessed a CIVIL PENALTY in the amount of ONE THOUSAND DOLLARS (\$1,000.00).
- The above assessed CIVIL PENALTY shall be paid to the Tennessee Department of Environment and Conservation within thirty (30) days of the receipt of this ORDER

Tom Trester, Director
Division of Solid Waste Management
Tennessee Department of Environment
and Conservation

#### NOTICE OF RIGHTS

The Respondent is hereby advised that in accordance with T.C.A. Section 68-212-113 it may secure a review of the necessity for or reasonableness of this ORDER by filing with the Commissioner, a written petition, setting forth the grounds and reasons for objection and asking for a hearing before the Solid Waste Disposal Control Board. This ORDER shall become final and not subject to review unless the Respondent petitions for a bearing within thirty (30) days after this ORDER is served. The hearing will be conducted in accordance with the Tennessee Uniform Administrative Procedures Act. T.C.A. 4-5-301 gt seq.

All correspondence pertaining to this matter should be addressed to Charles Allen, L&C Tower, 5th Floor, 401 Church Street, Nashville, Tennessee 37243-1535, Phone (615) 532-0780.

Charles Allen Enforcement Section

## Hazardous Waste Notification



Tennessee Department of Environment and Conservation; Division of Solid Waste Management Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

| Organization's full, legal r<br>TENNSCO CORPORATION PLA     | ame                     | <u> </u>   | in. nguain d                             |          | vi ally Cria                        | nges.<br>  Installation ic<br>  TNO 98-084-5. | lentificatio<br>390 | n numbe |
|---|-------------------------|------------|--|----------|-------------------------------------|---|---------------------|---------|
| 2. Mailing address  |                         | City       | ON                                       |          | State                               | Zip code<br>  37055                           |                     |         |
| 3 a. Site address FIRST & PICKETT STS                       |                         | City       |  |          | State                               | Zip code 3 70 55                              | County              |         |
| b. Latitude (degrees, minut 36.0500                         | es & seconds)           |            | Longitude<br>  ·87.2409                  | (deg     | rees. minut                         | es & seconds)                                 |                     |         |
| 4. Owner name (may be corp<br>LESTER SPEYER                 | poration or company     | y name)    | I  |          | Туре                                | Phone with an (615) 446-800                   |                     |         |
| 5. Manager or operator nam                                  | e                       | ·          |  |          | Туре                                | Phone with an (615) 446-800                   | rea code            |         |
| 6. Principal technical contac                               | t                       |            | FAX numbe                                | r with   | area code                           | Phone with an (615) 446-800                   | ea code             |         |
| 7. Number of employees 300                                  | Year operation be       |            | SIC codes   2542,                        | (Prima   | ary SIC firs                        | t.etc.)                                       | Job shop            | (N)     |
| 8. Emergency contacts for 24 Name a. MICKEY SELF            | 4 hours per day and     | 7 days p   | per week<br>  Time period<br>  ALL TIMES | cover    | red                                 | Phone with an (615) -446-8000                 |                     | :       |
| b. #ROY.STINSON   |                         |            | ALL TIMES                                |          |                                     | (615) 446-4564                                |                     |         |
| C.  |                         |            | HOME                                     |          |                                     | (615) 446-9432                                | ) .                 |         |
| d.  |                         |            | HOME                                     |          |                                     | (615) 789-5618                                |                     |         |
| 9. Do you receive RCRA haza                                 |                         |            |  |          |                                     |   |                     |         |
| 10. Certify that the information Signature of authorized re | on given in this doctor | ument is   | Title                                    |          |                                     |   | Date                |         |
| *** Below is for Department                                 | use only ***            |            | EXE                                      | CUTI     | UE A.                               | est.  | / /                 | - 98    |
| 1) Date received   County   County   22                     | code Priority           |            | Generator<br>Yes Noy                     | . [5     | Small Géne<br>Yes No M              | rator Special s                               | status              |         |
| 12. Date closed TSDR  | status Transpor         | rter statu | S  | <u>-</u> | ,                                   |   |                     |         |
| 13. Comments  |                         |            |  |          | · · · · · · · · · · · · · · · · · · |   |                     | 212.02  |
|   |                         |            |  |          |                                     |   |                     |         |



Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation. Division of Solid Waste Management Fifth Floor, L & C Tower, 401 Church Street. Nashville, TN 37243-1535 Please complete and/or correct, certify and return regardless. Retain a copy for your records. Organization's full name at facility Installation identification number TENNSCO CORPORATION PLANT 2/3 TND 98-084-5390 Waste name. Use standard name from regulations whenever possible. WASTE STREAM NUMBER LIQUID WASTE PAINT Give the **years** that this waste has been generated, e.g. 1975, 1982-. Date no longer generated. (MM/DD/YY) Annual Frequency of generation Continuous Accidental/ Various One time 1992 Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c). Reactive (e), Other toxic (f), TCLP (g)#F EPA waste codes. (Primary first, SIC code for generating six maximum.) 0001, F003, F005 process. 2542: 5. Physical form code 1% Solid 1% Water Vol. to wt. conversion If used for fuel. (pounds/gallon) chlorine content(PPM) BTU per pound Lig-Othr (3) 10.000 0.0 11,500.0 Generation rates in kilograms. Monthly maximum Annual average (kg Maximum stored onsite (kg) Maximum days stored 2<del>8,000.0</del> ( 5500 10,000 7. DOT shipping name DOT hazard class DOT ID code WASTE FLAMMABLE LIQUID ORM-D UN1993 8. Describe the generation process. COLLECTED AND TEMPORARILY STORED IN 55 GALLON DRUMS. (1) VARIES TO NO GENERATION Chemical Characteristics. Concentration units. Use PPM for TCLP Flash point Reactive code and EP Toxic wastes % volume(). % weight(). PPM() (140F Hazardous constituents. Give range of values at right. lower value upper value В. D. 10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions. JAN 1000 RDA02203 and 2497 CN-0773 (Rev. 11/95) Form Continues on the Back



Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation. Division of Solid Waste Management

Fifth Floor, L & C Tower, 401 Church Street. Nashville. TN 37243-1535

| rease complete and/or correct, cer  | tity and ret  | <u>urn regardless. Retain</u>                         | <u>a copy for you</u>                  | r records.   |                      |           |
|---|---------------|---|--|--|----------------------|-----------|
| Organization's full name at facility TENNSCO CORPORATION PLANT 2/3  |               |   |  | umber  |                      |           |
| <ol> <li>Waste name. Use standard name f<br/>WASTE PAINT SOLID</li> </ol>   | rom regulatio | ons whenever possible.                                |  | WASTE STR  | EAM NUMBE            | ER ·      |
| 3. Give the years that this waste has b generated, e.g. 1975, 1982 1992   | een           | Date no longer generate<br>(MM/DD/YY)                 | d.                                     | Annual Frequency of generation<br>  Continuous Accidental/ Various<br>  One time (/) |                      |           |
| Circle all appropriate hazard criter<br>Ignitable (a), EP toxic (b), Corrosive<br>Reactive (e), Other toxic (f), TCLP | ė (c).        | EPA waste codes. (Primsix maximum.)                   | ary first:                             | SIC code for process. 2542,  | generating           |           |
| 5. <b>Physical form</b> code  % Solid   | % Water       | Vol. to wt. conversion<br>(pounds/gallon)<br>  10.000 | If used for fuel chlorine contered 0.0 |  | BTU per por 12,500.0 |           |
| 6. <b>Generation rates</b> in kilograms. Monthly maximum (kg) 20,000.0  | Annual ave    | rage (kg)   | Maximum stor<br>50,000.                | . 0.   | Maximum da           | ys stored |
| 7. <b>DOT shipping</b> name WASTE FLAMMABLE SOLID   |               | Exp   | DOT hazard cl                          | ass 01   | DOT ID code          | •         |
| 8. Describe the generation process.   |               |   |  | <del></del>  |                      |           |

# NO WASTE GENERATED IN 1997

|   | Chemical Characteristics.<br>pH          | Flash point                             | Reactive code | Concentration us<br>and EP Toxic wa<br>% volume(). % w | nits. Use PPM for TC'LP stes veight( ). PPM(, ) |
|---|--|---|---------------|--|---|
|   | <b>Hazardous constituents</b> . Give ran | ge of values at right.                  |               | lower value  | upper value                                     |
| - |  |   |               |  |   |
|   | В.                                       | •                                       | •             |  |   |
| - | C  |   |               | 400  | •   |
| • | D  |   |               |  | ,   |
| - | E.                                       | * ************************************* |               |  |   |

10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.

CN-0773 (Rev. 11/95)

Form Continues on the Back



Hazardous Waste Stream Report
Tennessee Department of Environment and Conservation. Division of Solid Waste Management Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

brganization's full name at facility Installation identification number TND-98-084-5390 CORPORATION 2. Waste name. Use standard name from regulations whenever possible. WASTE STREAM NUMBER HOSPHORIC ACID Give the years that this waste has been generated, e.g. 1975, 1982-. Date no longer generated. (MM/DD/YY) Annual Frequency of generation Continuous Accidental/ Various 1997 12-31-97 Circle all appropriate hazard criteria below. Ignitable (a). EP toxic (b). Corrosive (c). Reactive (e). Other toxic (f). TCLP (g). EPA waste codes. (Primary first; SIC code for generating six maximum.) process. DOOZ a 542 5. Physical form code\_|% Solid |% Water Vol. to vt. conversion (pounds/gallon) If used for fuel. chlorine content(PPM)-BTU per pound LIQUID NL 8.32 NIA Generation rates in kilograms. Monthly maximum (kg) Annual average (kg) Maximum stored onsite (kg) Maximum days stored 510 7. DOT shipping name DOT hazard class DOT ID code + OSPHONIC ACID UN3264 BAW MATERIAL ( MOSPHORIC ACID USED IN MANUFACTUR) A WASTE BECAUSE NO WNOUN NEWDED Chemical Characteristics. Concentration units. Use PPM for TCLP Flash point Reactive code and EP Toxic wastes % volume(). % weight(). PPM() Hazardous constituents. Give range of values at right. lower value upper value NA C. D. : E. 10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions. NEUTRALIZATION -ČN-0773 (Rev. 11/95) Form Continues on the Back



Hazardous Waste Stream Report
Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

| Organization's full name at facili  | · · · · · · · · · · · · · · · · · · · |   |                                    | 1 Years 10 street                      | NE  |             |
|---|---------------------------------------|---|------------------------------------|--|---|-------------|
| TENNSCO CORI  | -                                     | PLANT                                       | 2/3                                | 1                                      | identification n<br>98 - 084              |             |
| 2. Waste name. Use standard name  | from regulatio                        | ns wherever possible                        | /3                                 |  | REAM NUMBE                                |             |
| WASTE CAUST   |                                       |   | •                                  |  | 6   |             |
| 3. Give the years that this waste has                                       |                                       | Date no longer gene (MM/DD/YY)              | erated.                            | Annual Freq                            | uency of genera                           | ntion       |
| generated, e.g. 1975, 1982-   |                                       | (MM/DD/YY)                                  |                                    | Continuous                             | Accidental/                               |             |
| 4. Circle all appropriate hazard crite                                      | uiu below i                           | EPA waste codes. (F                         | Primp first                        | SIC code for                           | One time                                  | <u> </u>    |
| Ignitable (a). EP toxic (b). Corrosi<br>Reactive (e). Other toxic (f). TCLF | ve(c)                                 | six maximum.)  DOOZ                         | illiary trist.                     | process.                               | 4Z.                                       | ·           |
| 5. Physical form code % Solid LIBUID Z                                      | % Water ~ 70                          | Vol. to wt. conversio (pounds/gallon)  8.32 | n If used for fue i chlorine conte | m(PPM)                                 | BTU per pót                               |             |
| 6. Generation rates in kilograms. Monthly maximum (kg)                      | Annual aver                           | rage (kg)                                   |                                    | red onsite (kg)                        | Maximum day                               | us stored . |
| 7. DOT shipping name  | <u> </u>                              |   | CDOT hazard o                      |  | IDOT ID code                              |             |
| WASTE SOOIOM IT   | FYOBXIA                               | DE SOLUTIO                                  |                                    | <b>3</b>                               | UN 18                                     | 24          |
| 8. Describe the generation process.   | •                                     |   |                                    | ************************************** |   |             |
| CAUSTIC USED  | 70 C                                  | LEAN PA                                     | INT L                              | INE                                    |   |             |
|   | ٠٠.                                   |   | •                                  |  | •   |             |
|   |                                       |   |                                    | •                                      |   |             |
| 9. Chemical Characteristics. pH . $\checkmark 100$ . $\bigcirc$             | Flash point                           | Reactive cod                                | e la                               | nd EP Toxic wa                         | nits. Use PPM<br>istes<br>veight(-), PPM( |             |
| Hazardous constituents. Give rai  | nge of values at                      | right.                                      | lo                                 | wer value                              | upper value                               |             |
| NA OH   |                                       |   |                                    | NIA                                    | NIA                                       | •           |
| В.  |                                       | •• •  |                                    |  |   |             |
| <u>C.</u>   | <del>,</del>                          |   |                                    |  | <u> </u>                                  |             |
|   |                                       |   | !                                  |  | •   |             |
| D   |                                       |   | İ                                  |  |   |             |
| E.  |                                       | •   |                                    |  |   |             |
| 10 Describe housest have managed  | ar intand to man                      |   |                                    |  | !   |             |
| 10. Describe how you have managed of Codes on page 6 of the instructions    | or intend to mai<br>5.                | nage uus waste turou                        | gh tinal dispositio                | n. Use the Was                         | ste Managemen                             | Method      |
| NEUTRAZIZATIO   | N - 7                                 | 3/  |                                    | È                                      |   |             |
|   |                                       | •   |                                    | <i>y™</i>                              | THE PROPERTY OF                           | P.          |
| CN-0773 (Rev. 11/95)  | F                                     | Form Continues on the                       | e Back                             | <u>J,Q</u>                             | * RDA-2203                                | 3 and 2497  |
|   |                                       |   |                                    | Solid & L                              | n <sub>ey</sub> (1)                       |             |
|   |                                       |   |                                    | 74                                     | RDA 7201<br>Pay 101<br>Saldous Wasi       | te          |

### RECEIVED DIV SOLID WASTE MGT



JAN 2 1 1999

| Group NoFI | ile No. |
|------------|---------|
|------------|---------|

10 No., 7ND-98-084-5390

# STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION NASHVILLE FIELD OPERATIONS NASHVILLE ENVIRONMENTAL FIELD OFFICE 3000 MORGAN ROAD JOELTON 37080

January 13, 1999

CERTIFIED MAIL Z 137 708 914 RETURN RECEIPT REQUESTED

Mr. Rocky Bowker, Environmental Coordinator Tennsco 201 Tennsco Drive P.O. Box 1888 Dickson, TN 37050-1888 OX TND 98-004-5390

RE:

NOTICE OF VIOLATION

Tennessee Hazardous Waste Management Act

Dear Mr. Bowker:

This letter confirms the observations and recommendations which were made during the Large Quantity Hazardous Waste Generator Inspection concerning your facility on January 6, 1999. The attached inspection report details the violations which were noted during the inspection.

Immediate action should be initiated to correct these violations. A follow-up inspection will be made after February 8, 1999 to verify that the appropriate corrective action has been taken.

If you have any questions concerning this letter or any part of the inspection report, please do not hesitate to contact me at (615) 299-9922.

Sincerely,

Tom Yates

Division of Solid Waste Management

TDY/bbm/tenn9184.doc

cc:

DSWM - Central Office U.S.E.P.A., Region IV

#### HAZARDOUS WASTE INSPECTION REPORT

#### SITE/PHYSICAL LOCATION:

Tennsco Plant 2/3 TND 98-004-5390 P.O. Box 606 First & Pickett Street Dickson, TN 37056 Dickson County

#### PRIMARY CONTACT:

Rocky Bowker, Environmental Coordinator Tennsco P.O. Box 1888 201 Tennsco Drive Dickson, TN 37056-1888 (615) 446-8000 FAX (615) 446-7224

#### DATE/TIME OF INSPECTION:

January 6, 1999 approximately 10:00 a.m.

#### **INSPECTION PARTICIPANTS:**

Tom Yates, Tennessee Department of Environment and Conservation, Division of Solid Waste Management, Nashville/Joelton Environmental Assistance Center Rocky Bowker, Environmental Coordinator, Tennsco Charles Carr, Paint Supervisor, Tennsco

#### REPORT PREPARED BY:

(615) 299-8749

Tom Yates
Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Nashville/Joelton Environmental Assistance Center
3000 Morgan Road
Joelton, TN 37080
Phone: (615) 299-9922

Tennsco January 13, 1999 pg. 2

#### PURPOSE OF INSPECTION:

This inspection was conducted to evaluate the Tennsco Plant 2/3 compliance with the applicable requirements of the Rules and Regulations promulgated pursuant to the <u>Hazardous Waste Management Act</u>, T.C.A. 68-212-101 et. seq. and the "<u>Tennessee Waste Reduction Act</u>," T.C.A. 68-212-301 et. seq.

#### FACILITY DESCRIPTION:

Tennsco manufactures metal welded cabinets, lockers, shop equipment and filing cabinets. Tennsco was originally Diebold Company and began operation in 1958. In January, 1962, Diebold sold the company and it became Tennsco. Tennsco is comprised of six separate facilities located in Dickson and employs approximately 300 people. Plant 2/3, the object of this inspection, consists of two buildings located on one continuous site and is considered one facility, has one EPA identification number. It is referred to as Plant 2/3 to acknowledge that there are two production buildings on site. The Plant 2/3 buildings were acquired in 1980 and production began around that time. The production processes used at Plant 2/3 include stamping, welding, shaping and painting. The administrative offices are located at 201 Tennsco Drive and this is the location of Rocky Bowker's (the inspection contact) office.

The Standard Industrial Classification (SIC) codes used by Tennsco include 2542, 2851, 3316, 3429 and 3452.

Tennsco reported generating over 1000 kg of hazardous waste in at least each of 3 months on their most recent annual report. Based on this information, they are classified as a large quantity hazardous waste generator.

#### INSPECTION FINDINGS:

This inspection consisted of a records review and a facility inspection. The records review included annual reports, manifests, contingency plan, waste reduction plan, training records, and inspection logs. The facility inspection included the waste generation processes, satellite accumulation, the less than 90 day accumulation area, and used oil containers.

Hazardous waste is generated from Tennsco's wet paint operations. The following hazardous waste stream is currently generated:

Waste Stream #4: Paint/Solvent EPA Waste Codes: D001, F003, F005 Estimated Monthly Maximum: 5500 kg Tennsco January 13, 1999 pg. 3

Generation Process: Cleaning of wet paint line equipment. Two satellite containers are in use for accumulation of this waste. One is located at what is known as the L & T paint line and the other is at what is known as the K-D line. Neither of these satellite containers were properly marked with the words "Hazardous Waste". Major Hazardous Constituents: Methyl ethyl ketone, toluene

A significant amount of paint waste like material generated by the liquid paint operation in Plant 3 is suitable to be used as an ingredient to make new paint. This paint material is collected in a 300 gallon tote tank provided by the paint manufacturer and is returned to them when it is full. The paint manufacturer uses this paint material in manufacturing new paint.

A one time generation of a caustic soda waste occurred in 1997 from the hardening of a cleaning powder, which caused it to be unusable. This situation is now corrected by the changing to a liquid cleaner.

The less than 90 day accumulation area is in a separate building adjacent to the plant. At this inspection, only one drum marked "Hazardous Waste" was seen in the area. The area was disorganized and housekeeping was generally poor. This condition was in part due to preparation for moving the less than 90 day accumulation area to a new structure which is very near completion. A review of the regulations pertaining to the emergency equipment, alarms communication, and other requirements for hazardous waste accumulation areas is recommended to ascertain that the new area is in compliance.

It is also noted that Tennsco is in the process of converting their wet painting operations to powder painting. The elimination of wet painting has reduced their hazardous generation. It was explained that the intention is to eventually convert all painting to powder painting.

Containers used to accumulate used oil had not been marked with the words "Used Oil".

The records review revealed that no hazardous waste training was done in 1998, and therefore, the regulation requirement to conduct annual hazardous waste training had not been met.

#### **VIOLATIONS:**

Rule 1200-1-11-.05(2)(g)3 states in part:

Facility personnel must take part in an annual review of the training required in part 1 of this subparagraph. Part 1 (iii) states:

(iii) At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by

familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:

- (I) Procedures for using, inspection, repairing, and replacing facility emergency and monitoring equipment;
- (II) Key parameters for automatic waste feed cut-off systems;
- (III) Communications or alarm systems;
- (IV) Response to fires or explosions;
- (V) Response to ground-water contamination incidents; and
- (VI) Shutdown of operations.

Based on the training records reviewed, the last hazardous waste training was done approximately in June, 1997.

Rule 1200-1-11-.03(4)(e)2.(iii) states in part:

While hazardous waste is being accumulated on-site, each container and tank used for that purpose be labeled or marked clearly with the words "Hazardous Waste".

The satellite containers located at the paint lines known as L & T paint line and K-D paint line were not marked "Hazardous Waste".

Rule 1200-1-11-.11(3)(c)3(i) states:

Containers and aboveground tanks used to store oil at generator facilities, must be labeled or marked clearly with the words "Used Oil".

The containers seen that were used to accumulate used oil were not properly marked.

TCA 68-212-306 "Tennessee Hazardous Waste Reduction Act of 1990" states in part:

68-212-306. Annual progress report.--(a) All generators shall annually review their waste reduction plan and complete a hazardous waste reduction progress report which shall:

- (1) Analyze and quantify progress made, if any, in hazardous waste reduction, relative to each performance goal established under § 68-212-305(b); and
- (2) Set forth amendments, if needed, to the hazardous waste reduction plan and explain the need for the amendments.

Tennsco January 13, 1999 pg. 5

- (b) Except for the information reported to the department under § 68-212-308, the annual progress report shall be retained at the facility and shall not be considered a public record under title 10, chapter 7, part 5. However, the generator shall permit any officer, employee or representative of the department at all reasonable times to have access to the annual progress report.
- (c) Large quantity generators shall complete the first annual progress report required under subsection(a) on or before March 1, 1993. Small quantity generators shall complete the first annual progress report required under subsection (a) on or before March 1, 1995. [Acts 1990, ch. 754, x 7; T.C.A., § 68-46-306.]

A hazardous waste reduction plan annual progress report, as required by the Waste Reduction Act of 1990, was not available for review.

#### **REMARKS**:

A fax from Rocky Bowker, dated January 7, 1999, addressing some of the questions that came up during the inspection, was received. With regard to paint waste generated at Plant 1, the fax verified this waste was non-hazardous and had been granted a special waste approval. The fax also explained the one time generation of caustic soda, EPA ID code D002 waste. In addition, it confirmed that no annual training had been done in 1998, and that steps were being taken to schedule training by the end of the month.

I appreciate the time and cooperation I was given during the inspection. If there are any questions regarding this report, contact Tom Yates at (615) 299-9922.

SICNIED.

cc:

ספותנותות

DATE: JOM. 19,1

DATE: Jan 19, 1999

DSWM-Central Office U.S.E.P.A., Region IV

96 STATE OF TENNESSEE HAZARDOUS WASTE CASE PROMILE HERORI. METER NO 11 > > < ( ( ) The named facility was cited in 96 for these violations: 1 601 13 [39505] 73 (90 96 110023 . At that time, a penalty of 180 ( | (1%) |) was assessed. Previous repeat violations may constitute the 20 TENNE (A) DRIVE SEE SAMEETIC LOGSBREET NOS mater of a Supplicant Non Compliant facility (SNC). 95SEQ DICKSON TN 37056 The archived case included these notes: 96SEO COLNTY COUNTY CODE 97SEQ DICKSON 43 Marratine All impection was conducted on T YATES 2/7/96 (615) 299-8451 of the NASH field office. Notice of Violation was issued detailing 5 violations. An Enforcement Action Request (EAR) dated 2/27/96 in received in Enforcement on 3/1/96 . The case was assumed to ALLEN-094R on The target date for completion of this case is 8/5/96 This case was closed on 1/30/97 THE FACELITY WAS CHARGED WITH THE POLLOWING VIOLATIONS WORKER CONSTRUCT 1200 code CFR violation status CT-CONTROLABL 35 DRIAS NO HIVLABEL 1200-1-11-03(4)(4)5(1)(1 265.17 CLOSED CORRECTED CALACTURATE SE DRIME NO ACC DATE 1200-1-11-03HKelenvk 262.34(4)(2) CLOSED CORRECTED DE CONTON AND NO ENER ALTO, COMM EQUPT, 8 PLL 1200-1-11-06(4)(4)1 245.6 CLOSED CORRECTED wauff able byce hwaccum 1200-1-11-03(4)(e)2(iv) 245.35 CLOSED CORRECTED DE PARTIES HISPCTICS NOT DONE HY ACC AREA 1200-1-11-034He)E(F) 265.174 CLOSED CORRECTED e de N' marciles e TOTAL VIOLATIONS EFFAT FROLITION # OUTSTANDING HEVE # OUTSTANDING VIOLATIONS CHARGE PROMITY 11049.00 DATE PAID ומובונ CONTRACT. ORO MO DATE CADER SKINED 1/9/97 1 11 17 Contracting \$1000.00 AND COST PAGE COMM CRO ONDER STATUS THE PERMIT MOREED ORDER \$1000.00 BALANCE CONTO \$0.00 CLOSED tal Maria BALANCE ZEROED SALE AFFICIAL D DATE SENT TO COO ATTORNAME.

COMMENSATION OF WAS COMED AS RESCARED THEN AN ORDER ASSAURED WITH A PAYMENT; RECORD WAS ALTERED TO SHOW

James 1772 MARIE

### REGULATORY REVIEW DOCUMENTS

## WABASH ALLOYS DIVISION OF CONNELL LIMITED PARTNERSHIP

(4 Pages)

JAN 05- 1770

Changes on this and Hert changes on this form. Full instructions are given with Form PH-2019A.

| F.              |   |                                       |
|-----------------|---|---------------------------------------|
|                 | Organization's name<br>WABASH ALLOYS DIVISON OF CONNELL LIMITED PARTNERSHIP   | EPA ID CODE<br>  TND 98-776-6524      |
| 2.              | R. R. 8 SOUTH PRINTWOOD DR DICKSON  | State Zip<br>TN 37055                 |
| 3.              | Physical location or address R. R. 8 SOUTH PRINTWOOD DR   | County name<br>DICKSON                |
|                 | Latitude   Longitude<br>36.2300 87.2100   | ,                                     |
| 4.              | Owner name<br>CONNELL LIMITED PARTNERSHIP   | Phone<br>(617) 567-260                |
| <b>5</b> .      | Manager or operator name<br>DENNY LUMA (PLANT MANAGER)  | ! Phone<br>(615) 446-0600             |
| 6.              | Principal technical contact DENNY LUMA  | Phone<br>(615) 446-0600               |
| •               | Number of employees   Year began  SIC codes   1987   3341.  | Job shop<br>NO                        |
| 8.              | Emergency contacts Name   Time period covere  | e Premi                               |
|                 | B ANDY LUNN 24 HRS  | (615)446-0600<br>(615)446-0600        |
|                 | D EDWIN J STOLARZ 24 HRS  | (615)446-0600<br>(219)563-7461        |
| A               | Current environmental permits for air, water, and radia permit type, number and expiration date. In a range marine by giving the first and last permit number. AIR PERMIT - \$025738P - EXP 3/1/90 AIR PERMIT - \$02577 | of related permits                    |
| 10.             | Check hazardous waste fuel burning activities below. Fuel blending or marketing a( ) fuel burning. Transporting fuel b( )   | · · · · · · · · · · · · · · · · · · · |
| 1.              | I certify that this information is true, accurate and Signature of authorized representative, title, date   | complete.                             |
|                 | Dans D. Low Hart Marger 21  | 23/90                                 |
| 9916<br>12<br>2 | Date revel County   Priority   Concretor   Small Con-   |                                       |
| 13.             | Date closed   Date regulated   Date deregulated /00/00 /00/00   | linsp. Freq.                          |

Mark changes on this form. Full instructions are given with Form PH-2022. 1. Organization's name. | EPA ID CODE WABASH ALLOYS DIVISON OF CONNELL LIMITED PARTNERSHIP TND 98-776-6524 Waste name. 2. : Waste stream ID DUST FROM FURNACE BAGHOUSE 1 3. Give years waste generated Date stopped | Frequency of generation 1988 - Mestat /00/00 Continuously 4. Mark all appropriate hazard criteria below. !EPA waste codes ! SIC Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f) CODES! Þ 1D004D008 1 3341 5. Physical form 1% Solid!% Water Lb. /gal. | Chlorine PPM | BTU/16. GRANULAR SOLID **! 100.0:** 0 8000000 V . 0 3.96 Generation rates in kilograms. Monthly maximum ! Annual average ! Max. amount stored ! Max. days stored 74 2 6 C 33,000 **844;XQQB** 13,600 **20000** 7. DOT shipping name | DOT hazard class | DOT ID code RG HAZARDOUS WASTE, SOLID, NOS ORM-E NA9189 (DOO6, DOOB) Describe generation process. BACHOUSE TYPE DUST COLLECTOR FROM #2 AND #3 SECONDARY ALUMINUM GAS FIRED REVERBERATORY FURNACES. ^ ANNUAL REPORT SECTION \*\* LINES 9-11 Amount generated : Amount on site on : Amount on site on Year during year (kg) { first day (kg) { last day (kg) 1989 32,727 42,345 'Amount Handled by site TSDF handling/Waste management methods A | OFFSITE: 76982 INI B | ONSITE: IYI C ! ONSITE: IYI D | ONSITE: IY! Check the efforts undertaken to reduce the volume and toxicity in the 10. generation of this waste during the reported year. Reformulation/redesign of product a( ) d. Substituting raw materials d( ) a. In process recycling. . . . . . b() e Improved operations. . . e() Equipment/technology modification c() f. No effort. . . . . . f(x)b. C. Other - explain below: . . . . . g( ) 11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year. a. more toxic-a() b. less toxic-b()/c.)No change-c(x). Amt of Reduction

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.

If below is incorrect, please Enthyriotectic Office of Solid Waste Management.

| 1. Organise allbys divisor of commell limite<br>PARTHERSHIP   | EO                           |               | EPA identification code<br>780 98-776-6524   |
|---|------------------------------|---------------|--|
| 2. Mailing address<br>600 PRINTHOOD DR  | City                         | State         | Zip code<br>37055  |
| 3 a. Site address<br>600 PRINTHOOD OR, DICKSON, IN 37055  | City                         | State         | Zip code   County name   Dickson   |
| b. intitude (degrees, minutes & seconds) 36.2300  | Longitude (des<br>87.2100    | prees, mir    | nutes & seconds)   |
| 4. Owner name<br>CONNELL LINITED PARTNERSHIP  |                              |               | Rhone with area code (617))567-2600  |
| 5. Manager or operator name<br>DENNY LUMA (PLANT MANAGER)   |                              |               | Phone with area code (615) 446-0600  |
| 6. Principal technical contact<br>DENNY LUMA  |                              |               | Phone with area code (615)3446-0600  |
| 7. Number of employees Year operation 67 1987   | began SIC codes (Prim        | ary SIC f     | irst,etc.) Job shop<br>Yes No  |
| 8. Emergency contacts for 24 hours per day  | and 7 days per week          | <del> </del>  |  |
| Name<br>&- DENNY LUMA   | Time period covers           |               | Phone with area code<br>(615) 446-0600   |
| b. ANDY LUNN  | 24 HRS                       |               | (615) 446-0600   |
| c. PAUL GAMARY  | 24 HRS                       |               | (615) 446-0600   |
| d. Edwin J Stolarz  | 24 HRS                       |               | (219) 563-7461   |
| List current environmental (air, water, expiration date, in a range of related STATE AIR PERMIT 035313P exp. 1931749P under renewal | i permits, give the first an | d last pe     | rmit humber.   |
| <ol> <li>Check the activities below you are er</li> <li>Fuel blending or marketing of haze<br/>as a fuel.</li> </ol>                | irdous waste b. Trans        | porting h     | ning házardous waste as a fuel.<br>Bzardous Waste as fuel . b(<br>bús Waste as fuel c( |
| d. Do you receive RCRA hazardous wast   | te from off-site and recycle | ₹7 Ye         | s ( ), No (X ).  |
| 11. Certify that the information given in Signature of authorized representative  | this document is true, accu  | rate and      | complete by signing and dating.  |
| Dames D. Jura   | Plant M                      | anager        | 2/18/94  |
| 12) Date received   County code   Prioris   |                              | nerator<br>No | Special status   |
| 13. Date closed   Date regulated  | Date deregulated             | A Section .   | <u> </u>   |
| 14.) comments postmarted 2-   | 28-94 DBW                    | <del></del>   | <del> </del>   |
| MAR 0 9 1994  |                              |               |  |

Hazardous Waste Stream Report
Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

|        | Organization's full name at facility.  ###################################                                 | EPA identification code TND 98-776-c524                                       |
|--------|--|---|
|        | Waste name. Use standard name from regulations whenever DUS? FROM FURNACE BAGHOUSE                         | possible.   Waste Stream number   |
| -      | Give the years that this waste has been generated, e.g. 1975, 1982 (HM/OD/XY) 1988- 1991 , 1993 (05/15/93) | generated. Frequency of generation  Continuous Accidental/ Vario  NO One time |
| •      |  | e codes. (Primary first;   SIC code for generating process.                   |
| •      | Physical form  % Solid  % Water   Vol. to wt. conversi (pounds/gallon)   Sid:Gran (8)   100.0   .0   3.760 | on If used for fuel, chlorine content (PPM) BTU per pound                     |
|        | Generation rates. Supply all rates in kilograms.  Monthly maximum (kg) Annual average (kg)  7,273.0 12,356 | aximum amount stored on-site   Maximum days stored (kg)   12,356              |
| •      | DOT shipping name  RQ HAIARDOUS WASTE, SOLID, NOS (DOGG, XXXXX); 0   | DOT mazard class DOT ID code  R M E 12 NA9189                                 |
| ;)<br> | Baghouse type dust collector form #2, #3 gas fired reverberatory furnaces.                                 | , #4, and #6 secondary aluminum   |
|        | Chemical Characteristics.  pH  | Concentration units. For EP toxic a   |

| <sup>рн</sup> 9. | 5.                | Flash point<br>>200 | Reactive code<br>None    | TCLP wastes, u<br>% volume( ), % | se PPM.<br>: weight(·), PPMX ) |
|------------------|-------------------|---------------------|--------------------------|----------------------------------|--------------------------------|
|                  | nd hazardous cons | tituents. Give r    | ange of values at right. | lower value                      | upper value                    |
| E XX             | Kararka           |                     | •                        | XX XXXX                          | XXXX                           |
| b.<br>· CAL      | (3006) MUIMC      |                     |                          | (.013)                           | 4.40)                          |
| c.               |                   |                     | ·                        |                                  |                                |
| d.               |                   |                     |                          |                                  |                                |
| e.               |                   |                     |                          |                                  |                                |

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

```
Wazardous Waste Stream Report - Front
                                                                   JAN 06, 1989
I instructions for form PH-2022 for additional information and codes.
ganization's name.
SHIAND CUSTOM CLEANERS
                                                                EPA ID CODE
                                                             TND 98-102-4797
ste name.
STE PERCHLOROETHYLENE BOTTOMS
                                                            | Waste stream ID
ve years waste generated
                             Date stopped | Frequency of generation
        1987
                                     /00/00
                                                      CONTINUOUS
TR all appropriate hazard criteria below. | EPA waste codes | SIC
nitable (a), EP toxic (b), Corrosive (c),
active (e), Other toxic (#)
DEST
                                             F002
                                                                1 7216
Vsidal form
                |% Solid |% Water | Lb. /gal. | Chlorina PPM | BTU/lb.
HER SOLID
                   1 10,000 1 .0
reration rates in kilograms.
Ethly maximum | Annual average | Max. amount stored | Max. days stored
     pping name
                                          | DOT hazard class | DOT ID code
TE PERC
                                          ORN-N
                                                         ил 1897 · 💉
cribe generation process.
GENERATED THRU DRYCLEANING PROCESS
WAL REPORT SECTION ** LINES 9-11
ort Amount generated Amount on site on Amount on site on during year (Ng) | first day (Ng) | last day (Ng)
    Amount Handled
                          | Handled | TSDF handling/Waste
                          | On site?| management methods
                          Y 20
X X
mok the afforts undertaken to reduce the volume and toxicity in the
                            YN
neration of this waste during the reported year.
ormulation/redesign of product a( ) & Substituting raw materials a( ) process tecycling. b( ) (e) Improved operations. a ( ) (e) Improved operations.
E - emplain below:
Face changes in volume and toxicity that those reduction efforts
Red in line 10 produced last year compared to the previous year.
toxic-a( ) b. less toxic-b( )(c.) No change-ct/) / Amt of Reduction
```

.1 instructions for form PH-2022 for additional information and codes.

ganization's name. "ND CUSTOM CLEANERS

EPA ID CODE TND 98-102-4797

sta name. STE PERCHLOROETHYLENE BOTTOMS

| Waste stream ID

emical Characteristics.

| Flash point | Reactive code | wastes, indicate PPM.

Concentration units. For EP toxic

jor and hazardous consituents.

lower l upper

this waste is recovered reclaimed, decycled or reused, describe how.

Safety Kleen

sertify that this information is true, accurate and complete. ;NATURE! (Generator or authorized representative), title and date.

--------ls for department use only.

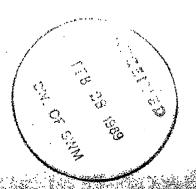
e rovd Complete?

Test results? Reasonable? Follow-up Mes No Yes (Ho Yes No | Yes /

Not hazardous (1); Demonstrated not hazardous (2); eherator (3); Resource recovery (4); Status Report exemption (5); Hazardous (6);

tal (7); No longer generated (8); Variance granted (9); y exempt (A); Mixed radiological wastse (R).

ments.



| Customs House  | ala Auli anno di   |  |  |  |                             |
|--|--|--|--|--|-----------------------------|
|  | on's full name at i  |  |  | EPA identification con   | de                          |
| Washla   | ad Custo   | on Cleane  | Med (  |  |                             |
| Z. Waste name.   | nam arangard USE   | Tram requistings when  | ever possible.   | Uasta Stream number  | 1-4797                      |
| )1   | m1.1   | And t  |  |  |                             |
| 3. Give the ye   | ers that this west   | de has been   Date no is   |  | 12   | •                           |
| Annald felt  |  | (PM/00   | )/YY)  | 1  | in                          |
| 4. Circle all  | appropriate hazard   | C COA  |  | Continuous Accidenta   | il/ Various                 |
| Reactive (e)   | ), Other taxic (†)   | Larrasive (c),   | waste codes. (Prima  | ry first)   SIC code for a   | enerating                   |
| . Physical to:   | rm Percen  |  | F002   |  |                             |
| then solid   | solid  | water (pounds per gal  | ersion  <br> an    chlorine<br>  | It used for fuel, content   BTU per po   |                             |
| . Generation r<br>Monthly maxi   | 744  | rates in kilnorane   | Maximus amount s   |  | /1b.                        |
| 45.  | //-  | AUUNE: STIEMESE  | 1  | tored on site Maximum days   | stored                      |
| . DOT shipping   |  | 465  |  | ⟨ (kg)  <b>(</b> )   | 60                          |
| carota   | 1.1  | •  | DOT hazard class   | spos Ol TOO  |                             |
| Uescribe gene  | -Kleen   | conp.  | UN1897   | 72,000   |                             |
|  |  | •  | mothere  |  |                             |
| hazardous wa<br>instructions<br>keport<br>Year   | etion and handlings are generators. For other handle Amount generated during year (kg)   | Complete at end of each ith line 12.  I data. If waste was shor handling in a permiting, use "H" codes from Amount on site first day of years.   | year and when termi ipped off site; als ted facility; use " instructions.  On Asquit   | nating business for a was<br>a submit Annual Shipping Re<br>"", "5", or "0" codes from<br>on site on<br>y of year (kg)   | ste which                   |
| Annual gener<br>hazardous wa<br>instructions<br>keport<br>Year   | Assumt generated during year (kg)  | Complete at end of each ith line 12.  I data. If waste was shor handling in a permiting, use "H" codes from Amount on site first day of your seasons.  | year and when termi ipped off site; als ted facility; use " instructions.  On Asquit   | o submit Annual Shipping Ra<br>", "5", or "0" codes from<br>on site on<br>y of year (kg)   | ite which                   |
| Handar gener<br>hazardous wa<br>instructions<br>keport<br>fear<br>/ 997<br>iAmount Handi   | Amount generated during year (kg)  | Complete at end of each ith line 12.  data. If waste was shor handling in a permitting, use "H" codes from Amount on site first day of your codes from the codes of the codes from the codes of the codes from the codes of the co | year and when termi ipped off site, also ted facility, use a instructions.  on Amount ear (kg)   last di   | on site on   | Part for                    |
| instructions instructions ieport ear  Amount Handle  | Amount generated during year (kg)  ed   Handled   Year   Y | Complete at end of each ith line 12.  I data. If waste was shor handling in a permiting, use "H" codes from Amount on site first day of your codes for the first day of your codes.  SOF handling/Waste management methods   | pear and when termi ipped off site, als ted facility, use a instructions.  On Amount ear (kg) Amount Amount Hendled b Amount Hendled   | o submit Annual Shipping Re "", "5", or "D" codes from  on site on y of year (kg)  Ohandled   TSDF handling On site?   management m  T/N  Handled   TSDF handling On site?   management  | /Waste                      |
| instructions instructions ieport fear  Amount Handi  | ed Handled On site?  Y/N   | Complete at end of each ith line 12.  I data. It waste was shor handling in a permiting, use "H" codes from Amount on site first day of your sanagement methods  T-63  SDF handling/Waste management methods   | pear and when termi ipped off site; also ted facility; use a instructions.  on Amount ear (kg)   last di Amount Handled b Amount Handled d   | on site on yof year (kg)  Handled   TSDF handling on site?   | /Waste ethods               |
| Annual gener hazardous wa instructions instructions report fear Amount Handle Amount Handle Check the efthe reported a. Reformul b. In proce c. Equipmen | ed Handled On site?  Y/N  for undertaken in year. This reduct in recycling. It technology modification and in the recycling.   | Complete at end of each ith line 12.  I data. If waste was shor handling in a permiting, use "H" codes from Amount on site first day of your first day of each first day of your first day of each first day of each first day of each first day of your first day of yo | pear and when termi ipped off site; also ted facility; use a instructions.  on Amount ear (kg)   last di Amount Handled b Amount Handled d   | o submit Annual Shipping Re "", "S", or "D" codes from  on site on y of year (kg)  Ohandled   TSDF handling anagement m  Y/N  Handled   TSDF handling on site?   management m  Y/N  heration of this waste during t reatment methods.  | /Waste ethods               |
| Amount Handle  Check the efthe reported  Reformul  La proce  C. Equipmen   | ed Handled To On Site?  Handled To On Site?  Tyles undertaken if year. This reductation and the second actions to the second action of the second action reductation and reductation action of the second action reductation and reductation actions action and reductation actions action and reductation actions action and reductation actions actions actions actions actions action actions actions actions actions actions actions actions action actions  | Complete at end of each ith line 12.  I data. If waste was shor handling in a permiting, use "H" codes from Amount on site first day of your first day of each first day of your first day of each first day of each first day of each first day of your first day of yo | ipped off site, also ted facility, use a instructions.  On Amount Handled Amount Handled b Amount Handled d toxicity in the geometricity in the ge | on site on codes from the codes from | /Waste ethods               |
| Amount Handle  Check the ef the reported a. Reformul b. In proce c. Equipmen g. Other -  | ed Handled Tilders undertaken to year. This reduct the reduction of the re | Complete at end of each ith line 12.  I data. If waste was shor handling in a permiting, use "H" codes from Amount on site first day of your day of yo | ipped off site, also ted facility, use a instructions.  on Amount Handled Amount Handled Amount Handled do not processes and no Substituting raw as laproved operations.   | on site on codes from the codes from | /Waste ethods               |
| Amount Handle  Check the ef the reported a. Reformul b. in proce c. Equipmen g. Other —  | ed Handled Ton site?  If the senerators of the senerators of the senerators of the senerated during year (kg)  If the senerated during year (kg)  If the senerated of the senerated of the senerate of the sen | Complete at end of each ith line 12.  I data. If waste was shor handling in a permiting, use "H" codes from Amount on site first day of your day of yo | ipped off site, also ted facility, use a instructions.  On Amount Handled Amount Handled Amount Handled I dustituting raw male processes and no Substituting raw male proved operations No effort.   | on site on the site?  Annual Shipping Reference of the site of the site of the site?  The site of the site?  The site of the site of the site?  The site of the si | /Waste ethods /Waste ethods |